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 NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD 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

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: Romero Gas Com A 1

API Number: 30-045-25509 OCD Permit Number:

U/L or Qtr/Qtr K Section 27 Township 29N Range 10W County: San Juan

Center of Proposed Design: Latitude 36.69456 Longitude -107.87391 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.

Variances 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 H_2S, 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	☐ Yes ☐ No ☐ 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	☐ 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 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	☐ 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 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	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ 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
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: Victoria Venegas **Approval Date:** 09/19/2023

Title: Environmental Specialist **OCD Permit Number:** 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: 2/8/2023**

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): Amanda Walker Title: Operations/Regulatory Technician – Sr

Signature: Date: 8/22/2023

e-mail address: mwalker@hilcorp.com Telephone: 346-237-2177

Hilcorp Energy Company
San Juan Basin
Below Grade Tank Closure Report

Lease Name: Romero Gas Com A 1
API No.: 30-45-25509

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:

1. HILCORP shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do 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, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, HILCORP will file the C144 Closure Report as required.

   The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

2. HILCORP shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

   All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

3. HILCORP will receive prior approval to 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 approves.

   The below-grade tank was disposed of in a division-approved manner.

4. If there is any on-site equipment associated with a below-grade tank, then HILCORP shall remove the equipment, unless the equipment is required for some other purpose.

   All on-site equipment associated with the below-grade tank was removed.

5. HILCORP will test the soils beneath the below-grade tank to determine whether a release has occurred. HILCORP shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. Hilcorp shall notify the division of its results on form C-141.

8/22/2023

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.0	250

6. If HILCORP or the division determines that a release has occurred, then HILCORP shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

   A release was determined for the above referenced well.

7. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then HILCORP shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

   The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

8. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
   i. Operator's name
   ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

   Notification is attached.

9. The surface owner shall be notified of HILCORP's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

   The closure process notification to the landowner was sent via email, certified mail. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. 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 place 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.

    The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

11. HILCORP shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will be used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. Hilcorp will repeat seeding or planting will be continued until successful vegetative growth occurs.

8/22/2023

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

    The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
    - Soil Backfilling and Cover Installation **(See Report)**
    - Re-vegetation application rates and seeding techniques **(See Report)**
    - Photo documentation of the site reclamation **(Included as an attachment)**
    - Confirmation Sampling Results **(Included as an attachment)**
    - Proof of closure notice **(Included as an attachment)**

8/22/2023

Mandi Walker

From:	Mandi Walker
Sent:	Monday, February 6, 2023 11:10 AM
To:	Brandon Sinclair; Burdine, Jaclyn, EMNRD; Clara Cardoza; Eufracio Trujillo; Kandis Roland; Kate Kaufman; Keri Hutchins; Mandi Walker
Cc:	Shad Brown; Kelly Davidson; Lisa Jones
Subject:	72 Hour Closure Notice - Romero Gas Com A 1 - 30-045-25509 (Area 7)
Attachments:	Romero Gas Com A 1_BGT Closure PLAN ONLY.pdf
Follow Up Flag:	Follow up
Due By:	Monday, March 27, 2023 8:00 AM
Flag Status:	Flagged

The subject well has a below-grade tank that will be permanently removed. The BGT Permit is attached. Please contact me at any time if you have any questions or concerns. The BGT Closure Plan only was filed with OCD on 2/6/2023, action id 182801.

Well Name: Romero Gas Com A 1
API#: 30-045-25509
Location: K-27-29N-10W
Footages: 1850 FSL 1850 FWL
Operator: HEC
Surface Owner: FEE
Reason for Removal: Will be changed to an AGT
Scheduled Date & Time of Start: Wednesday February 8th @ 12 pm.

Lisa, please send notification to the Landowner

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.

Mandi Walker
San Juan North/South (6,7) Regulatory Technician
Hilcorp Energy
346.237.2177
mwalker@hilcorp.com

7021 0950 0000 8197 2546

Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
$

Extra Services & Fees (check box, add fee as appropriate)
- ☐ Return Receipt (hardcopy) $
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- ☐ Adult Signature Restricted Delivery $

Postage
$

Total Postage and Fees
$

Postmark Here

BGT-S
Romero
BGSCom A1

Sent To
Carl & Barbara Padilla
Street and Apt. No., or PO Box No.
38 Road 5267
City, State, ZIP+4®
Farm, NM 87401

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Carl & Barbara Padilla
38 Road 5267
Farmington, NM
87401

9590 9402 6977 1225 6608 05

2. Article Number (Transfer from service label)
7021 0950 0000 8197 2546

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Carl Padilla
☐ Agent
☐ Addressee

B. Received by (Printed Name)
Carl Padilla

C. Date of Delivery
2-17-23

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

FARMINGTON NM 87401
FEB 17 2023
USPS

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

BGT-Romero GOS Com A1

Hilcorp

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®

7021 0950 0000 8197 2546

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U.S. Postal Service™
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OFFICIAL USE

Certified Mail Fee
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Extra Services & Fees (check box, add fee as appropriate)
- ☐ Return Receipt (hardcopy) $
- ☐ Return Receipt (electronic) $
- ☐ Certified Mail Restricted Delivery $
- ☐ Adult Signature Required $
- ☐ Adult Signature Restricted Delivery $

Postage
$

Total Postage and Fees
$

Postmark Here

BGT-S Romero GasComA1

Sent To
Carl + Barbara Padilla
Street and Apt. No., or PO Box No.
38 Road 5267
City, State, ZIP+4®
Farm, Nm 87401

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

February 6, 2023

Transmitted Via
Certified Mail 7021 0950 000

To: Carl & Barbara Padilla
38 Road 5267
Farmington, NM 874

Re: **ROMERO GAS COM A 1**
API: 30-045-25509
Unit K (NE/SW) Section 27, T29N, R10W
San Juan County, New Mexico

Dear Landowner:

Pursuant to New Mexico Administrative Code § 19.15.17.13 (E) (1) operator shall provide the surface owner of the operator's proposal to close a below- grade tank.

In compliance with this requirement, please consider this letter as notification that Hilcorp San Juan, L.P. intends to close a below-grade tank on the subject well pad. The closure process will begin between 72 hours and one week from this notification.

If you have any questions regarding this work, please call within five (5) days of receiving this notice.

Sincerely,

Ke

South

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carl + Barbara Padilla
38 Road 5267
Farmington, NM
87401

9590 9402 6977 1225 6608 05

2. Article Number (Transfer from service label)

7021 0950 0000 8197 2546

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

BGT-Romero Gas Com A1

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
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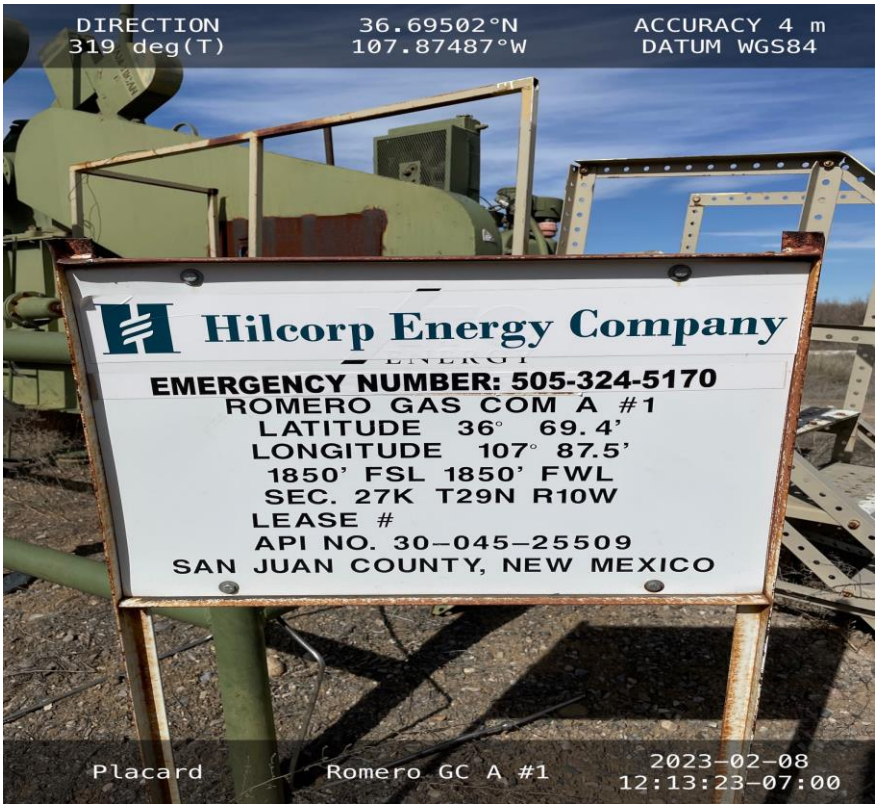
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery


DIRECTION
319 deg(T)
36.69502°N
107.87487°W
ACCURACY 4 m
DATUM WGS84
Hilcorp Energy Company
EMERGENCY NUMBER: 505-324-5170
ROMERO GAS COM A #1
LATITUDE 36° 69.4'
LONGITUDE 107° 87.5'
1850' FSL 1850' FWL
SEC. 27K T29N R10W
LEASE #
API NO. 30-045-25509
SAN JUAN COUNTY, NEW MEXICO
Placard
Romero GC A #1
2023-02-08
12:13:23-07:00


DIRECTION
303 deg(T)
36.69499°N
107.87519°W
ACCURACY 5 m
DATUM WGS84
Tank
Romero GC A #1
2023-02-08
12:13:59-07:00


DIRECTION
250 deg(T)
36.69495°N
107.87526°W
ACCURACY 4 m
DATUM WGS84
BGT Pit
Romero GC A #1
2023-02-08
12:14:42-07:00

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	

I Release Notification

Responsible Party

Responsible Party: Hilcorp Energy	OGRID 372171
Contact Name: Kate Kaufman	Contact Telephone: 346-237-2275
Contact email: kkaufman@hilcorp.com	Incident # *(assigned by OCD)* nAPP2320149561
Contact mailing address: 1111 Travis St. Houston, TX 77471	

Location of Release Source

Latitude 36.695036 Longitude -107.873901
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Romero Gas Com A #1	Site Type: Well Site
Date Release Discovered: 2/10/2023	API# *(if applicable)* 30-045-25509

Unit Letter	Section	Township	Range	County
K	27	029N	010W	San Juan

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (*Name:*)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls) 0
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls) 0
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☒ Other (describe) Unknown hydrocarbon	Volume/Weight Released (provide units) Estimated 5.3 bbls	Volume/Weight Recovered (provide units) 5.3 bbls

Cause of Release

Historic release discovered during BGT removal operations. Initial BGT closure sample was collected on 2/8/2023 and results were received on 2/10/2023. Hilcorp proceeded with delineation and determined an estimated release volume on 7/13/2023.

Form C-141
Page 2

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? ☐ Yes ☒ 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)?
N/A

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.
☒ The impacted area has been secured to protect human health and the environment.
☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not 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: __Kate Kaufman_____ Title: __Environmental Specialist_____

Signature: Kathy Kaufman _____ Date: __7/20/2023_____

email: __kkaufman@hilcorp.com_____ Telephone: _____346-237-2275_____

OCD Only

Received by: _____ Date: _____

Mandi Walker

From: Kate Kaufman
Sent: Thursday, July 20, 2023 3:06 PM
To: Mandi Walker
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions
Attachments: Romero Gas Com A #1_C-141 Initial_7-20-2023.pdf; 1. Rpt_2302500_Romero_GC_A_1_Final_v1.pdf

Here you go for the Romero. Let me know if you need anything else from my end.

C-141 and First set of sample results.

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Wednesday, July 19, 2023 9:53 AM
To: Kate Kaufman <kkaufman@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions

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

Good morning to you Kate,

Thanks for letting me know!

Sounds good,

Shelly

From: Kate Kaufman <kkaufman@hilcorp.com>
Sent: Wednesday, July 19, 2023 8:33 AM
To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Cc: Mandi Walker <mwalker@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions

Good morning Shelly,

I am following up with you regarding the extension request for the Romero Gas Com A1 BGT closure. We finally got clean samples and believe we have addressed all impacted soil. The estimated historic release volume is approximately 5 bbls. Therefore, I will be submitting a C-141 to the Incidents group. I will follow up with the analytical data and copy of the C-141 by the end of the week.

Please let me know if you have any questions or require additional information.

Thank you,
Kate

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Tuesday, June 20, 2023 10:03 AM
To: Kate Kaufman <kkaufman@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions

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

Good morning Kate,

Extension for closure has been granted for this BGT until July 23, 2023.

Have a great week,

Shelly

Shelly Wells * Environmental Specialist-Advanced
Administrative Permitting Program
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive|Santa Fe, NM 87505
(505)469-7520|Shelly.Wells@emnrd.nm.gov
http://www.emnrd.state.nm.us/OCD/

From: Kate Kaufman <kkaufman@hilcorp.com>
Sent: Monday, June 19, 2023 1:45 PM
To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Cc: Mandi Walker <mwalker@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions

Good afternoon Shelly,

I am following up with you regarding the extension request for the Romero Gas Com A1 BGT closure. We did some additional excavation and had one sample that is still above closure limits, though not by much. We would like to request one more 30 day extension through July 23, 2023 to mobilize equipment back to the location, excavate further, and collect a final sample. I do believe we are close to getting this closed out.

Please let me know if you have any questions or require additional information.

Thank you,
Kate

Kate Kaufman | Senior Environmental Specialist | Hilcorp Energy Company
O: 346-237-2275 | C: 907-244-8292 | kkaufman@hilcorp.com
1111 Travis St. | Houston | TX | 77002

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Tuesday, May 9, 2023 2:46 PM
To: Kate Kaufman <kkaufman@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>
Subject: RE: [EXTERNAL] Hilcorp - BGT Closure Extensions

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

Hi Kate,

Yes, you can have extensions on these closure reports! Romero Gas Com A1 will be due by June 23, 2023. I called you back about Pearce. No C-141 is needed so please just submit everything you had previously sent me together in the closure report.

Thank you,

Shelly

Shelly Wells * Environmental Specialist-Advanced
Administrative Permitting Program
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive|Santa Fe, NM 87505
(505)469-7520|Shelly.Wells@emnrd.nm.gov
http://www.emnrd.state.nm.us/OCD/

From: Kate Kaufman <kkaufman@hilcorp.com>
Sent: Tuesday, May 9, 2023 1:06 PM
To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Cc: Mandi Walker <mwalker@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>
Subject: [EXTERNAL] Hilcorp - BGT Closure Extensions

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good afternoon Shelly –

We have two BGT closures that are due today, and for which I need to request extensions.

1. Romero Gas Com A1 – this site is not fully delineated. We will excavate additional soil, then resample. Based on analytical results, I expect that will be sufficient for closure. I would like to request a 45 day extension to complete this closure.
2. Pearce Gas Com 1E – I am just waiting to hear back from you on the Closure Plan Only versus old BGT standards, and which will apply. I will submit the C-141 today if needed so we can get this closed out.

Please let me know if you have any questions.

Thank you,

Kate

Kate Kaufman | Senior Environmental Specialist | Hilcorp Energy Company
O: 346-237-2275 | C: 907-244-8292 | kkaufman@hilcorp.com
1111 Travis St. | Houston | TX | 77002

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HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

February 16, 2023

Kate Kaufman
HILCORP ENERGY
PO Box 4700
Farmington, NM 87499
TEL: (505) 564-0733
FAX

RE: Romero GC A 1 OrderNo.: 2302500

Dear Kate Kaufman:

Hall Environmental Analysis Laboratory received 1 sample(s) on 2/10/2023 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **2302500**
Date Reported: **2/16/2023**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: HILCORP ENERGY
Client Sample ID: Bottom Comp
Project: Romero GC A 1
Collection Date: 2/8/2023 3:20:00 PM
Lab ID: 2302500-001 **Matrix:** SOIL **Received Date:** 2/10/2023 6:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **DGH**
Diesel Range Organics (DRO)	120	9.6		mg/Kg	1	2/15/2023 2:25:18 AM
Motor Oil Range Organics (MRO)	55	48		mg/Kg	1	2/15/2023 2:25:18 AM
Surr: DNOP	95.9	69-147		%Rec	1	2/15/2023 2:25:18 AM
EPA METHOD 300.0: ANIONS						Analyst: **CAS**
Chloride	ND	60		mg/Kg	20	2/14/2023 5:29:22 PM
EPA METHOD 8260B: VOLATILES SHORT LIST						Analyst: **RAA**
Benzene	ND	0.024		mg/Kg	1	2/14/2023 9:50:35 AM
Toluene	ND	0.047		mg/Kg	1	2/14/2023 9:50:35 AM
Ethylbenzene	ND	0.047		mg/Kg	1	2/14/2023 9:50:35 AM
Xylenes, Total	ND	0.095		mg/Kg	1	2/14/2023 9:50:35 AM
Surr: 1,2-Dichloroethane-d4	116	70-130		%Rec	1	2/14/2023 9:50:35 AM
Surr: 4-Bromofluorobenzene	150	70-130	S	%Rec	1	2/14/2023 9:50:35 AM
Surr: Dibromofluoromethane	101	70-130		%Rec	1	2/14/2023 9:50:35 AM
Surr: Toluene-d8	112	70-130		%Rec	1	2/14/2023 9:50:35 AM
EPA METHOD 8015D MOD: GASOLINE RANGE						Analyst: **RAA**
Gasoline Range Organics (GRO)	58	4.7		mg/Kg	1	2/14/2023 9:50:35 AM
Surr: BFB	140	70-130	S	%Rec	1	2/14/2023 9:50:35 AM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Above Quantitation Range/Estimated Value
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2302500**

16-Feb-23

Client: HILCORP ENERGY

Project: Romero GC A 1

Sample ID: **MB-73181**	SampType: **mblk**	TestCode: **EPA Method 300.0: Anions**							
Client ID: **PBS**	Batch ID: **73181**	RunNo: **94587**							
Prep Date: **2/14/2023**	Analysis Date: **2/14/2023**	SeqNo: **3420367**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: **LCS-73181**	SampType: **lcs**	TestCode: **EPA Method 300.0: Anions**							
Client ID: **LCSS**	Batch ID: **73181**	RunNo: **94587**							
Prep Date: **2/14/2023**	Analysis Date: **2/14/2023**	SeqNo: **3420368**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.8	90	110			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2302500**

16-Feb-23

Client: HILCORP ENERGY

Project: Romero GC A 1

Sample ID: **LCS-73126**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **73126**	RunNo: **94595**
Prep Date: **2/10/2023**	Analysis Date: **2/15/2023**	SeqNo: **3420304** Units: **%Rec**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.0		5.000		80.0	69	147			

Sample ID: **LCS-73138**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **73138**	RunNo: **94595**
Prep Date: **2/10/2023**	Analysis Date: **2/15/2023**	SeqNo: **3420305** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	49	10	50.00	0	98.9	61.9	130			
Surr: DNOP	4.0		5.000		79.8	69	147			

Sample ID: **MB-73126**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **73126**	RunNo: **94595**
Prep Date: **2/10/2023**	Analysis Date: **2/15/2023**	SeqNo: **3420309** Units: **%Rec**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.0		10.00		79.9	69	147			

Sample ID: **MB-73138**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **73138**	RunNo: **94595**
Prep Date: **2/10/2023**	Analysis Date: **2/14/2023**	SeqNo: **3420310** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	8.1		10.00		81.3	69	147			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Above Quantitation Range/Estimated Value
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.		

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: **2302500**
16-Feb-23

Client: HILCORP ENERGY
Project: Romero GC A 1

Sample ID: **lcs-73134** SampType: **LCS** TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **LCSS** Batch ID: **73134** RunNo: **94585**
Prep Date: **2/10/2023** Analysis Date: **2/13/2023** SeqNo: **3419352** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.97	0.025	1.000	0	97.1	70	130			
Toluene	1.1	0.050	1.000	0	107	70	130			
Surr: 1,2-Dichloroethane-d4	0.60		0.5000		119	70	130			
Surr: 4-Bromofluorobenzene	0.58		0.5000		115	70	130			
Surr: Dibromofluoromethane	0.48		0.5000		95.1	70	130			
Surr: Toluene-d8	0.52		0.5000		104	70	130			

Sample ID: **mb-73134** SampType: **MBLK** TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **PBS** Batch ID: **73134** RunNo: **94585**
Prep Date: **2/10/2023** Analysis Date: **2/13/2023** SeqNo: **3419353** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.55		0.5000		110	70	130			
Surr: 4-Bromofluorobenzene	0.54		0.5000		109	70	130			
Surr: Dibromofluoromethane	0.45		0.5000		90.4	70	130			
Surr: Toluene-d8	0.54		0.5000		108	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2302500**

16-Feb-23

Client: HILCORP ENERGY

Project: Romero GC A 1

Sample ID: **LCS-73134** SampType: **LCS** TestCode: **EPA Method 8015D Mod: Gasoline Range**

Client ID: **LCSS** Batch ID: **73134** RunNo: **94585**

Prep Date: **2/10/2023** Analysis Date: **2/13/2023** SeqNo: **3419311** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	27	5.0	25.00	0	108	70	130			
Surr: BFB	560		500.0		111	70	130			

Sample ID: **mb-73134** SampType: **MBLK** TestCode: **EPA Method 8015D Mod: Gasoline Range**

Client ID: **PBS** Batch ID: **73134** RunNo: **94585**

Prep Date: **2/10/2023** Analysis Date: **2/13/2023** SeqNo: **3419312** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	550		500.0		111	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: HILCORP ENERGY Work Order Number: 2302500 RcptNo: 1

Received By: Juan Rojas 2/10/2023 6:30:00 AM

Completed By: Tracy Casarrubias 2/10/2023 8:38:21 AM

Reviewed By: JN 2/10/23

Chain of Custody

1. Is Chain of Custody complete?	Yes ☐	No ☑	Not Present ☐
2. How was the sample delivered?	Courier		

Log In

3. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
5. Sample(s) in proper container(s)?	Yes ☑	No ☐	
6. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
7. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
8. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
9. Received at least 1 vial with headspace <1/4" for AQ VOA?	Yes ☐	No ☐	NA ☑
10. Were any sample containers received broken?	Yes ☐	No ☑	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
13. Is it clear what analyses were requested?	Yes ☑	No ☐	
14. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)

Adjusted? _____

Checked by: JN 2/10/23

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	0.4	Good	Yes	Morty		

Chain-of-Custody Record

Client: Hilcorp

Mailing Address:

Phone #:

email or Fax#: brandon.sinclair@hilcorp.com

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)

Accreditation: ☐ Az Compliance
☐ NELAC ☐ Other

☐ EDD (Type)

Turn-Around Time:
☑ Standard 5day ☐ Rush

Project Name: Romero GC A #1

Project #:

Project Manager: Kate Kaufman

Sampler: Brandon Sinclair

On Ice: ☑ Yes ☐ No

# of Coolers: 1 Morty

Cooler Temp(Including CF): 0.2+0.2=0.4 (°C)

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2302500	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)
2-8	1520	Soil	Bottom Comp	4 oz jar	cool	001	✓	✓					✓			

Analysis Request

Relinquished by:	Received by:	Via:	Date	Time
Date: 2-9 Time: 1439				
Date: 2/9/23 Time: 1830		courier	2/10/23	6:30

Remarks:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Tuesday, September 19, 2023 1:15 PM
To: Mandi Walker
Subject: 30-045-25509 ROMERO GAS COM A #001 [321831] BGT

30-045-25509 ROMERO GAS COM A #001 [321831] BGT

Ms. Walker,
NMOCD has reviewed the closure report submitted by [372171] HILCORP ENERGY COMPANY for a BGT associate with well 30-045-25509 ROMERO GAS COM A #001 [321831]. The closure request is approved with the following conditions:
A five-point soil composite sample was taken of the below-grade tank. It was determined that a release has occurred. The incident number for this release is NAPP2320149561. The operator must remediate/back-fill and meet the requirements of Part 29 for this site.
Please let me know if you have any additional questions.
Regards,

Victoria Venegas ● Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
506 W. Texas Ave. Artesia, NM 88210
(575) 909-0269 | Victoria.Venegas@emnrd.nm.gov
https://www.emnrd.nm.gov/ocd/

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 255611

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 255611
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	NMOCD has reviewed the closure report submitted by [372171] HILCORP ENERGY COMPANY for a BGT associate with well 30-045-25509 ROMERO GAS COM A #001 [321831]. The closure request is approved with the following conditions: A five-point soil composite sample was taken of the below-grade tank. It was determined that a release has occurred. The incident number for this release is NAPP2320149561. The operator must remediate/back-fill and meet the requirements of Part 29 for this site.	9/19/2023