From: <u>Mitch Killough</u>
To: <u>Smith, Cory, EMNRD</u>

Cc: Enviro, OCD, EMNRD; Adeloye, Abiodun A; Hencmann, Devin; Hyde, Stuart

Subject: [EXTERNAL] Hilcorp - Mansfield #11 Project Update - NCS1913741281

Date: Wednesday, October 20, 2021 7:53:37 AM

Attachments: 2021 1015 NM3-003 C-137EZ Hilcorp Energy Company Mansfield #11N Small Landfarm registration approval.pdf

Form C-137 Mansfield #11 Small Landfarm Registration-ALL.pdf

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

Cory,

Hilcorp Energy Company is providing the Aztec District Office with the approved Small Landfarm Registration, to be used for remediation of soils originating from the Mansfield #11 site. Specifically, petroleum-impacted soil from the Mansfield #11 site will be landfarmed on the active Mansfield #11N well pad, located approximately 900 feet north. The small landfarm will be operated in accordance with the applicable requirements of 19.15.36.16 NMAC and the conditions of approval outlined in the attached approval document.

Please feel free to call or email with any questions or comments at this time.

Sincerely,

Mitch Killough

Environmental Specialist Hilcorp Energy Company 1111 Travis Street Houston, TX 77002 713-757-5247 (office) 281-851-2338 (cell) mkillough@hilcorp.com

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State of New Mexico Energy, Minerals and Natural Resources Department

Adrienne Sandoval

Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd E. Leahy, JD, PhD Deputy Secretary

Director, Oil Conservation Division



October 15, 2021

Mr. Mitch Killough Hilcorp Energy Company 1111 Travis Street Houston, Texas 77002

RE: Small Registered Landfarm Approval
Hilcorp Energy Company
NM3-003 - Mansfield #11N Landfarm
NESW of Section 29, Township 30 North, Range 9 West, NMPM
San Juan County, New Mexico

Mr. Killough:

The Oil Conservation Division (OCD) has completed its review of Hilcorp Energy Company's (Hilcorp) registration application dated September 13, 20121 to construct and operate a small registered landfarm, referred to as Mansfield #11N, for the remediation of petroleum hydrocarbon-contaminated soils (excluding drill cuttings). The OCD hereby approves Hilcorp to construct and operate the registered small landfarm. Mansfield #11N, in compliance with the applicable requirements of 19.15.36.16 NMAC and with the following understanding and conditions:

- Hilcorp has proposed an area of 1.2 acres for their landfarm facility. The 1.2 acres shall incorporate the required landfarm cell berming to prevent rainwater run-on and run-off and a single lift of eight inches or less (approximately 1000 cubic yards per acre per eight-inch lift), as required of 19.15.36.7.A(5) NMAC; and
- Hilcorp shall achieve the following closure performance standards within three years
 from the registration date or shall remove landfarmed soils that have not or cannot be
 remediated to a division-approved surface waste management facility:
 - o benzene, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 0.2 mg/kg (per 19.15.36.16.E(1)(a) NMAC);
 - o Total BTEX, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 50 mg/kg (per 19.15.36.16.E(1)(b) NMAC);

Hilcorp Energy Company NM3 - 003 October 15, 2021 Page 2

- TPH, as determined by EPA SW-846 method 418.1 or the sum of GRO/DRO/MRO by EPA SW-846 method 8015M, shall not exceed 100 mg/kg (per Table I of 19.15.29.12 NMAC);
- o the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, shall not exceed 500 mg/kg (per 19.15.36.16.E(1)(c) NMAC); and
- o chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg (per 19.15.36.16.E(1)(d) NMAC).

If there are any questions, please do not hesitate to contact me at (505) 469-7486 or brad.a.jones@state.nm.us.

Respectfully,

Brad A. Jones

Environmental Specialist

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

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

For State Use Only: Registration #

> Form C-137 EZ Revised August 1, 2011

Submit 1 Copy to Santa Fe Office

REGISTRATION/ FINAL CLOSURE REPORT FOR SMALL LANDFARM

Section 7 of 19.15.36 NMAC defines a small landfarm as a centralized landfarm of two acres or less that has a total capacity of 2000 cubic yards or less in a single lift of eight inches or less, remains active for a maximum of three years from the date of its registration and that receives only petroleum hydrocarbon-contaminated soils (excluding drill cuttings) that are exempt or non-hazardous waste. The operator shall operate only one active small landfarm per governmental section at any time

	active small fandram per governmental section at any time.												
GI	ENERAL IN	NFOR	MATION	N									
1.	2	X Small Landfarm Registration			(Small Landfarm Final Closure Report* (*Must be submitted within three years from the registration date)							
2.	Operator:	Hil	corp Ene	rgy Compan	y		Widst oc subin	nica wi			uic regist		
	Address: 1111 Travis Street, Houston, TX 77002												
	Contact Person: Mitch Killough						Phone: 713-757-5247						
3.	Location: _	NE	E/4	SW	_/4 Se	ection	29	Towns	ship3	0N	Range _	9W	
RF	EGISTRAT	ION											
sta	. As operator, are you the surface estate owner of the proposed site? Yes X No If no, please attach a certification tatement that demonstrates a written agreement is established with the surface estate owner authorizing the use of the site for the roposed small landfarm.												
2	Will the n	ronose	d small la	andfarm com	nlv wit	h the si	iting requireme	ents of S	Subsection	s A and B	of 19.15	36.13 NMAC	?

□ No A. Depth to ground water.

X Yes

- No small landfarm shall be located where ground water is less than 50 feet below the lowest elevation at which the operator will place oil field waste.
- **B.** No surface waste management facility shall be located:
 - within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - within an existing wellhead protection area or 100-year floodplain;
 - within, or within 500 feet of, a wetland:
 - within the area overlying a subsurface mine;
 - within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
 - within an unstable area, unless the operator demonstrates that engineering measures have been incorporated into the surface waste management facility design to ensure that the surface waste management facility's integrity will not be compromised.
- Attach a plat and topographic map showing the small landfarm's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the small landfarm site; watercourses; fresh water sources, including wells and springs; oil and gas wells or other production facilities; and inhabited buildings within one mile of the site's perimeter.

Based on the information provided with this submittal, registration of a small landfarm can only be granted if the operator complies with the following understandings and conditions:

- The operator shall operate only one active small landfarm per governmental section at any time. No small landfarm shall be located more than one mile from the operator's nearest oil or gas well or other production facility.
- The operator shall accept only exempt or non-hazardous wastes consisting of soils (excluding drill cuttings) generated as a result of accidental releases from production operations, that are predominantly contaminated by petroleum hydrocarbons, do not contain free liquids, would pass the paint filter test and where testing shows chloride concentrations are 500 mg/kg or below.
 - The operator shall berm the landfarm to prevent rainwater run-on and run-off.
- The operator shall post a sign at the site readable from a distance of 50 feet and listing the operator's name; small landfarm registration number; location by unit letter, section, township and range; expiration date; and an emergency contact telephone number.
- The operator shall spread and disk contaminated soils in a single eight inch or less lift within 72 hours of receipt. The operator shall conduct treatment zone monitoring to ensure that the TPH concentration, as determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed 2500 mg/kg; and that the chloride

concentration, as determined by EPA method 300.1, does not exceed 500 mg/kg. The operator shall treat soils by disking at least once a month and by watering and adding bioremediation enhancing materials when needed.

- The operator shall maintain records reflecting the generator, the location of origin, the volume and type of oil field waste, the date of acceptance and the hauling company for each load of oil field waste received. The division shall post on its website each small landfarm's location, operator and registration date. In addition, the operator shall maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection. The operator shall maintain all records for five years following the small landfarm's closure.
- The operator shall submit a final closure report on a form C-137 EZ, together with photographs of the closed site, to the environmental bureau in the division's Santa Fe office.

CERTIFICATION

I hereby certify that the information submitted with this registration is true, accurate and complete to the best of my knowledge and belief and agree to the understandings and conditions of this registration.

Name: Mitch Killough	Title: Environmental Specialist								
Signature: Shh Shp	Date:9/13/2021								
E-mail Address: mkillough@hilcorp.com									
OCD REGISTRATION: 🗵 Approved. Date: October 15, 2021	Denied. Date:								
Comments: Please see the attached approval letter with condition	ns.								
OCD Representative Signature:									
Title: Environmental Specialist	OCD Registration Number: NM3-003								
FINAL CLOSURE REPORT									
Were the landfarmed soils able to achieve the closure performance standards, listed below, within three years from the registration date? ☐ Yes ☐ No (Please provide laboratory analytical results) • benzene, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 0.2 mg/kg; • Total BTEX, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 50 mg/kg; • TPH, as determined by EPA SW-846 method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, shall not exceed 500 mg/kg; and • chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg. If yes, were the additional closure requirements listed below satisfied? ☐ Yes ☐ No (Please provide photos) • The operator shall re-vegetate soils remediated to the closure performance standards if left in place in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC. • If the operator returns remediated soils to the original site, or with division permission, recycles them, re-vegetate the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC; • The operator shall remove berms on the small landfarm and buildings, fences, roads and equipment; and • The operator shall clean up the site and collect one vadose zone soil sample from three to five feet below the middle of the treatment zone, or in an area where liquids may have collected due to rainfall events; the vadose zone soil sample shall be collected and analyzed using the methods specified above for TPH, BTEX and chlorides. If no, were the landfarmed soils that have not or cannot be remediated to the closure performance standards within three years removed to a division-approved surface waste management facility, and the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC and re-vegetated? ☐ Yes ☐ No (Please provide photos) CERTIFICATION I hereby certify that th									
Name:	Title:								
Signature:	Date:								
E-mail Address:									
OCD CLOSURE REVIEW: Closure Approved. Date :									
Comments:									
OCD Representative Signature: Title:									
11/1/-									

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

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

For State Use Only: Registration #

> Form C-137 EZ Revised August 1, 2011

Submit 1 Copy to Santa Fe Office

REGISTRATION/ FINAL CLOSURE REPORT FOR SMALL LANDFARM

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	active small fandram per governmental section at any time.												
GI	ENERAL IN	NFOR	MATION	N									
1.	2	X Small Landfarm Registration			(Small Landfarm Final Closure Report* (*Must be submitted within three years from the registration date)							
2.	Operator:	Hil	corp Ene	rgy Compan	y		Widst oc subin	nica wi			uic regist		
	Address: 1111 Travis Street, Houston, TX 77002												
	Contact Person: Mitch Killough						Phone: 713-757-5247						
3.	Location: _	NE	E/4	SW	_/4 Se	ection	29	Towns	ship3	0N	Range _	9W	
RF	EGISTRAT	ION											
sta	. As operator, are you the surface estate owner of the proposed site? Yes X No If no, please attach a certification tatement that demonstrates a written agreement is established with the surface estate owner authorizing the use of the site for the roposed small landfarm.												
2	Will the n	ronose	d small la	andfarm com	nlv wit	h the si	iting requireme	ents of S	Subsection	s A and B	of 19.15	36.13 NMAC	?

□ No A. Depth to ground water.

X Yes

- No small landfarm shall be located where ground water is less than 50 feet below the lowest elevation at which the operator will place oil field waste.
- **B.** No surface waste management facility shall be located:
 - within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - within an existing wellhead protection area or 100-year floodplain;
 - within, or within 500 feet of, a wetland:
 - within the area overlying a subsurface mine;
 - within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
 - within an unstable area, unless the operator demonstrates that engineering measures have been incorporated into the surface waste management facility design to ensure that the surface waste management facility's integrity will not be compromised.
- Attach a plat and topographic map showing the small landfarm's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the small landfarm site; watercourses; fresh water sources, including wells and springs; oil and gas wells or other production facilities; and inhabited buildings within one mile of the site's perimeter.

Based on the information provided with this submittal, registration of a small landfarm can only be granted if the operator complies with the following understandings and conditions:

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concentration, as determined by EPA method 300.1, does not exceed 500 mg/kg. The operator shall treat soils by disking at least once a month and by watering and adding bioremediation enhancing materials when needed.

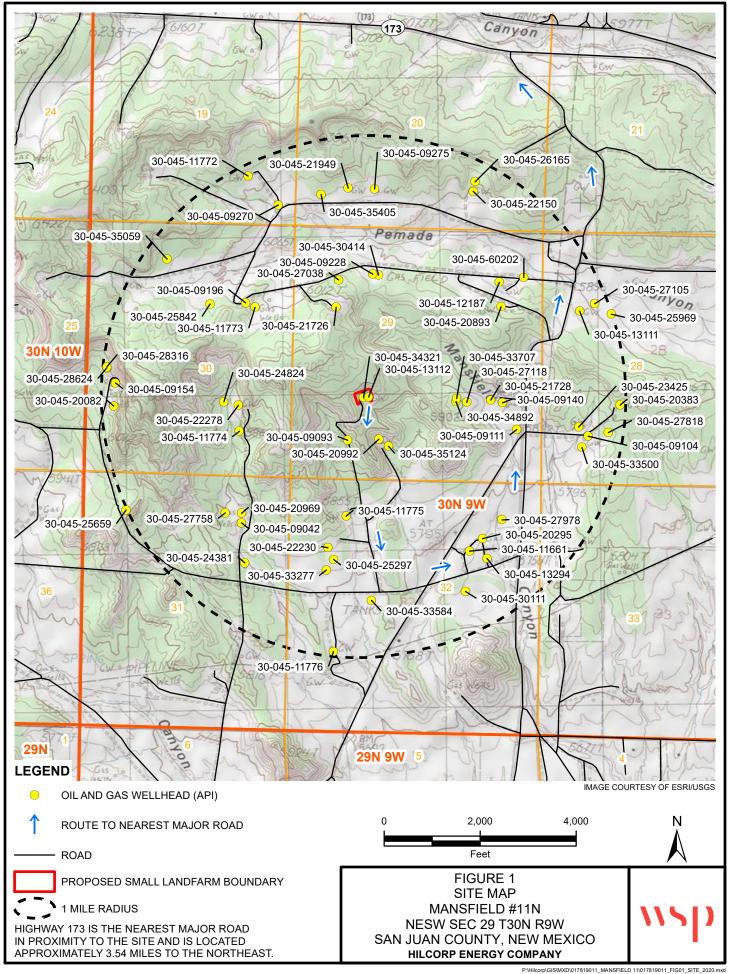
- The operator shall maintain records reflecting the generator, the location of origin, the volume and type of oil field waste, the date of acceptance and the hauling company for each load of oil field waste received. The division shall post on its website each small landfarm's location, operator and registration date. In addition, the operator shall maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection. The operator shall maintain all records for five years following the small landfarm's closure.
- The operator shall submit a final closure report on a form C-137 EZ, together with photographs of the closed site, to the environmental bureau in the division's Santa Fe office.

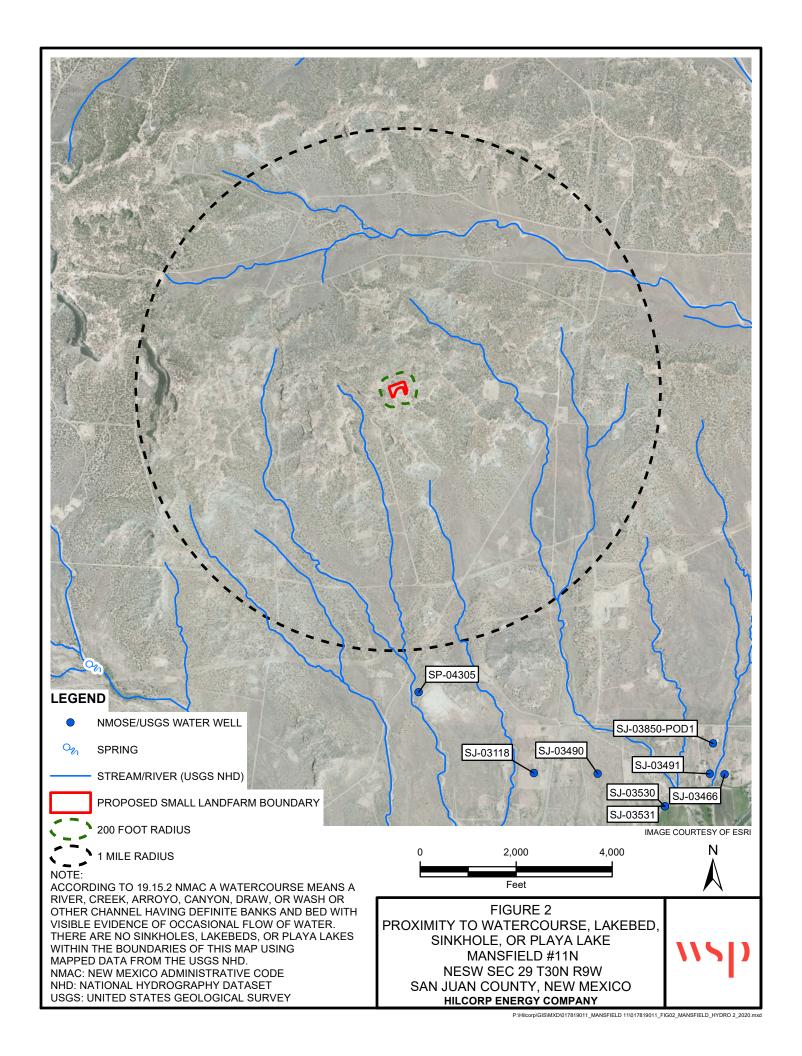
CERTIFICATION

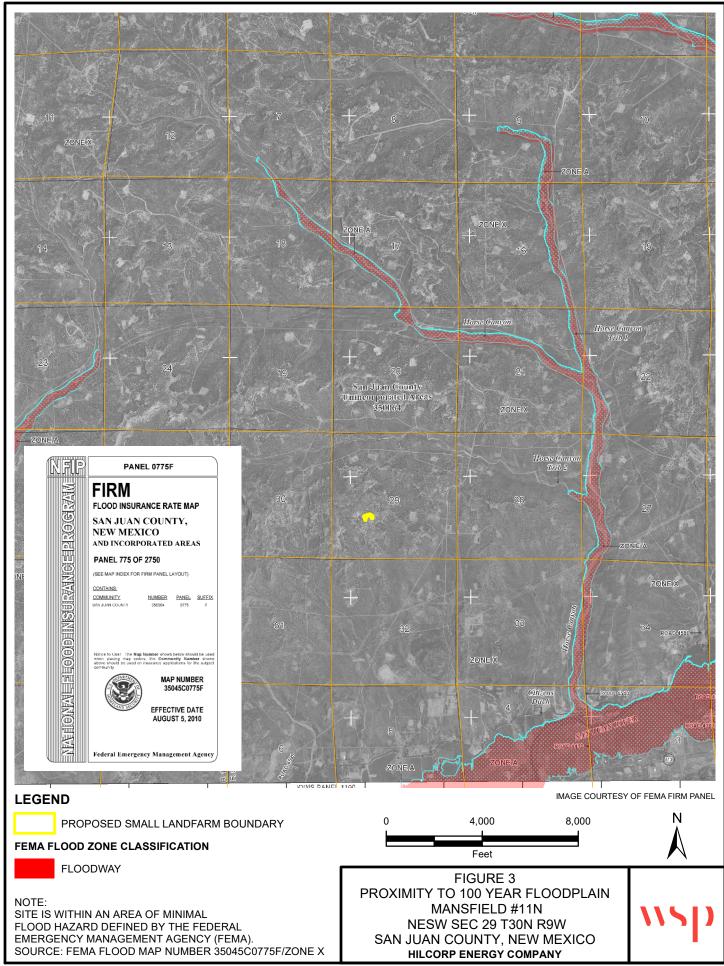
I hereby certify that the information submitted with this registration is true, accurate and complete to the best of my knowledge and belief and agree to the understandings and conditions of this registration.

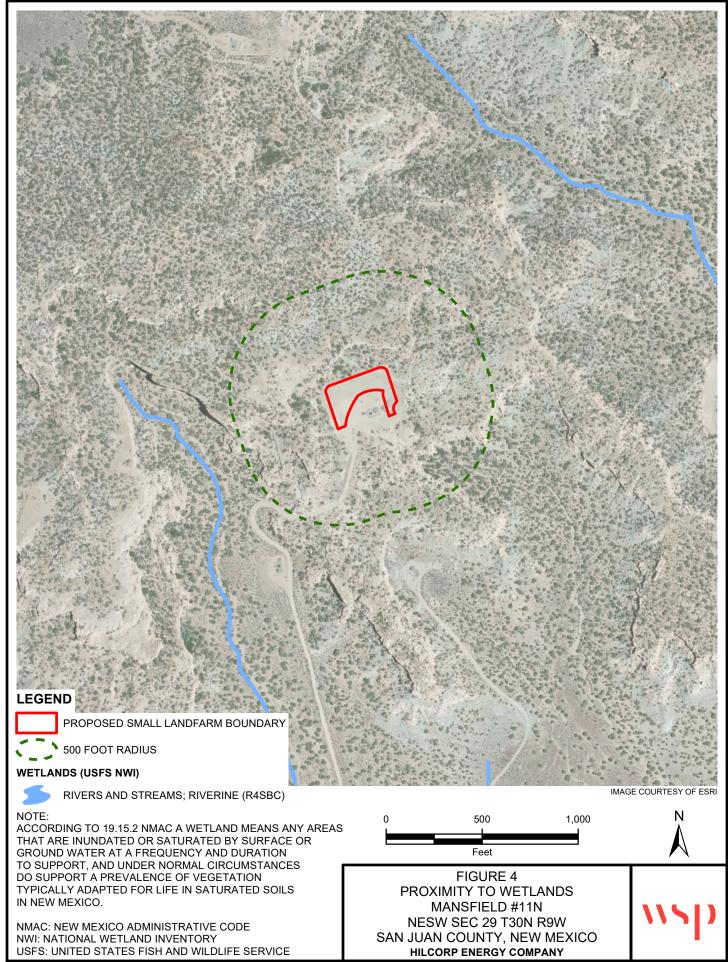
Name: Mitch Killough	Title: Environmental Specialist					
Signature: Mh Shipt	Date:9/13/2021					
E-mail Address: mkillough@hilcorp.com						
OCD REGISTRATION: Approved. Date :	Denied. Date:					
Comments:						
OCD Representative Signature:						
Title:	OCD Registration Number:					
FINAL CLOSURE REPORT						
Were the landfarmed soils able to achieve the closure performance standards, listed below, within three years from the registration date?						
and belief.						
Name:	Title:					
Signature:	Date:					
E-mail Address:						
OCD CLOSURE REVIEW: Closure Approved. Date :						
OCD Representative Signature:						
Title:	OCD Registration Number:					

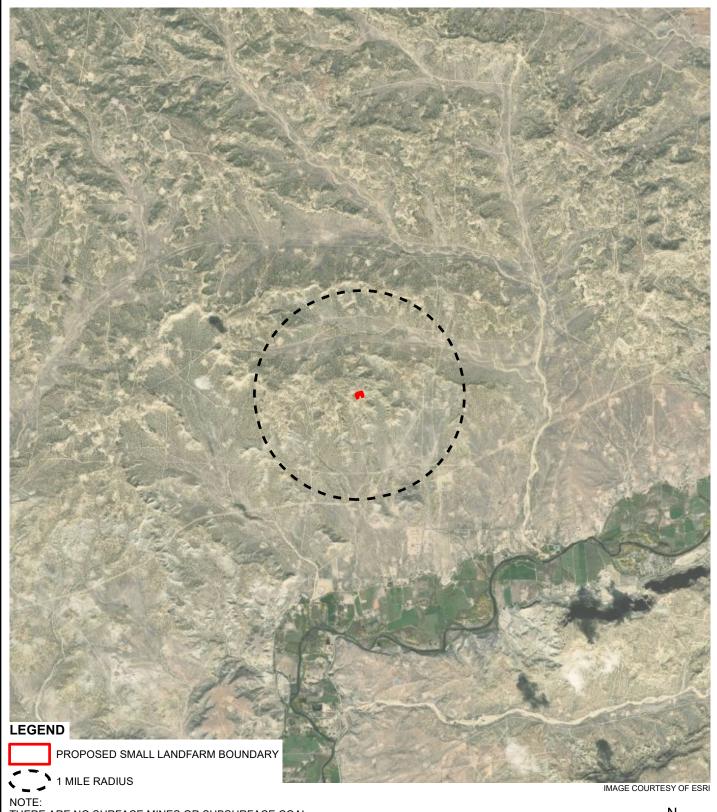
NMAC SLIREACE WASTE N	1ANAGEMENT FACILITIES SITING CRITERIA	WSP USA Inc.		
SUMMARY INFORMATION		848 East Second Avenue		
19.15.13 NMAC & 19.15.2		Durango, Colorado 81301		
		T 970-385-1096		
GENERAL INFORMATION				
Operator:	Hilcorp Energy Company	Date:	3/29/2021	
Site Name:	Mansfield #11N	Prepared By:	Stuart Hyde	
Latitude:	36.78040	Longitude:	-107.80726	
Section:	29	Section Unit:	K	
Township:	30 N	Range:	9W	
Site Elevation:	6040.12 feet		3**	
GENERAL SITING CRITERIA	1		Yes/No	Figure Reference
Within 200 feet of a waterco	ourse, lakebed, sinkhole or playa lake?			
southwest of the proposed f	nnamed dry wash, second-order tributary of the San acility location. No watercourses, lakebeds, sinkhole m boundaries according to United States Geological	s, or playa lakes are located within 200	No	Figures 1 & 2
Figure 3 and the attached FE	within the 100-year or 500-year flood plain as indica MA Panel. As shown on the Panel, the site is specfica nimal flood hazard", further defined as an area "dete	ally located in the unshaded, or no	No	Figure 3
·	f a wetland? Riverine approximatly 738 feet southwest of the sit- /ildlife Service (USFWS) National Wetland Inventory	•	No	Figure 4
contacted on August 13, 202	subsurface mine? 7.4 miles to the West. Mike Tompson with the EMNR 10 to confirm that The New Mexico Abandoned Mine rea. Email contact is included in this packet.	•	No	Figure 5
Within 500 feet from the ne	arest permanent residence, school, hospital, institus to the SE. Updated fied verification by Eric Carroll (Con Co	noll No	Figure 6
division-approved facility's s Closest karst geologic enviro	area susceptible to natural or human-induced event structural components? nment is ~46 miles to the North. In addition, data pr seismic activity in the area of the Site (within the bo	ovided by the USGS indicates that	No	Figure 7
Within an existing wellhead The proposed waste manage well or spring used by <5 hor fresh water well or spring. W that have been installed to r	protection area? ment facility is not located within 200 horizontal fee useholds for domestic or stock watering purpose, or lells SJ04353 PODs 1 through 5 depicted on Figure 9 nonitor groundwater conditions at the Mansfield #1: ghts and are not intended for irrigation, domestic, lin	within 1,000 horizontal feet any other are classified as "monitoring wells" 1N remediation site. These wells do	No	Figure 8
Estimated Depth to Ground	water:	>100		
Justification:		Figure 9		
Distance to Closest water we	ell with groundwater data:	866 feet, southeast		
Well Name:		SJ 4353 POD 1		
Wellhead Elevation:		5923 feet		
Depth to groundwater:				
		15.12 feet		
Groundwater Elevation:		5907.88 feet		
Elevation difference betwee small landfarm location:	n groundwater elevation of nearest well and propos	ed 132.24 feet		
approximatly 117 feet low	ater well SJ 4353 POD 1 has a depth to water of a er in elevation than the proposed site. Therefore greater than 100 feet. Refer to Figure 9.			







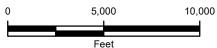




THERE ARE NO SURFACE MINES OR SUBSURFACE COAL MINES WITHIN THE BOUNDARIES OF THIS MAP ACCORDING TO DATA PROVIDED BY NMEMNRD AND EIA.

MIKE THOMPSON WITH THE NMEMNRD MINING & MINERALS DIVISION WAS CONTACTED TO CONFIRM THAT THE NEW MEXICO ABANDONED MINE LAND PROGRAM HAS NO RECORD OF UNDERGROUND MINES IN THIS AREA

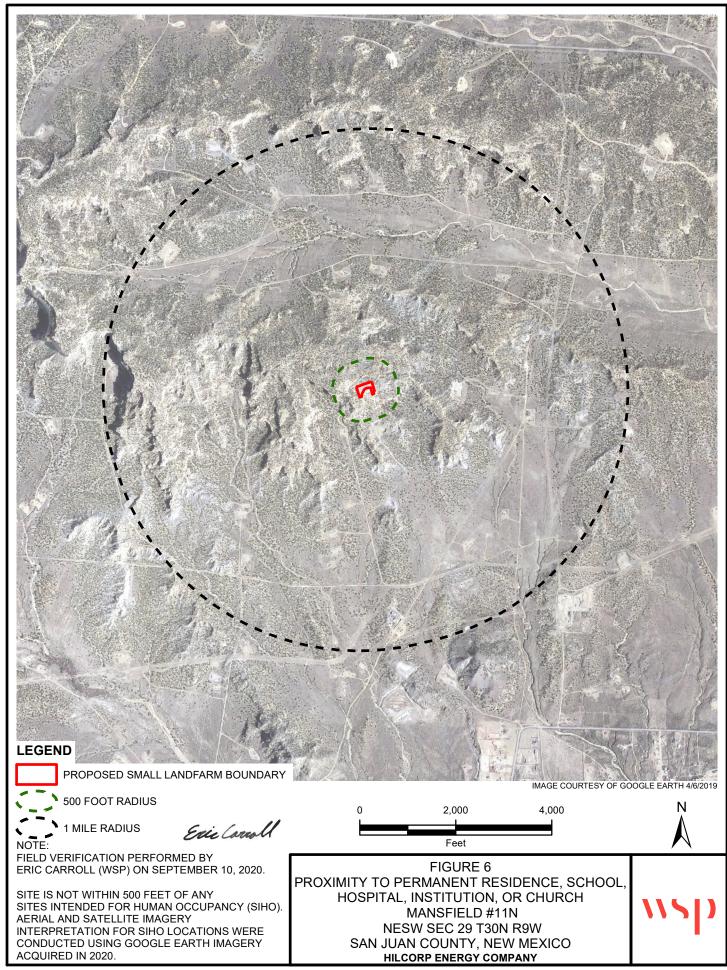
EIA: ENERGY INFORMATION ADMINISTRATION NMEMNRD: NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT



N N

FIGURE 5
PROXIMITY TO SUBSURFACE MINE
MANSFIELD #11N
NESW SEC 29 T30N R9W
SAN JUAN COUNTY, NEW MEXICO
HILCORP ENERGY COMPANY





Josh Adams

From: Tompson, Mike, EMNRD < Mike.Tompson@state.nm.us>

Sent: Wednesday, August 12, 2020 10:12 AM

To: Josh Adams
Cc: Devin Hencmann

Subject: RE: Question about abandoned mines

Hi Josh,

That appears to be Section 29, Township 30 North, Range 9 West. The New Mexico Abandoned Mine Land Program has no record of abandoned mines in that Section.

Please let me know if you have any further questions.

Mike Tompson

New Mexico Energy, Minerals and Natural Resources Department
Mining and Minerals Division
Manager, Abandoned Mine Land Program
1220 South St. Francis Drive
Santa Fe NM 87505
(505) 690-8063 [cell]
www.NMMines.com
MMD Online – Searchable Mine Database

From: Josh Adams <jadams@ltenv.com> Sent: Tuesday, August 11, 2020 3:58 PM

To: Tompson, Mike, EMNRD < Mike. Tompson@state.nm.us>

Cc: Devin Hencmann < dhencmann@ltenv.com> **Subject:** [EXT] Question about abandoned mines

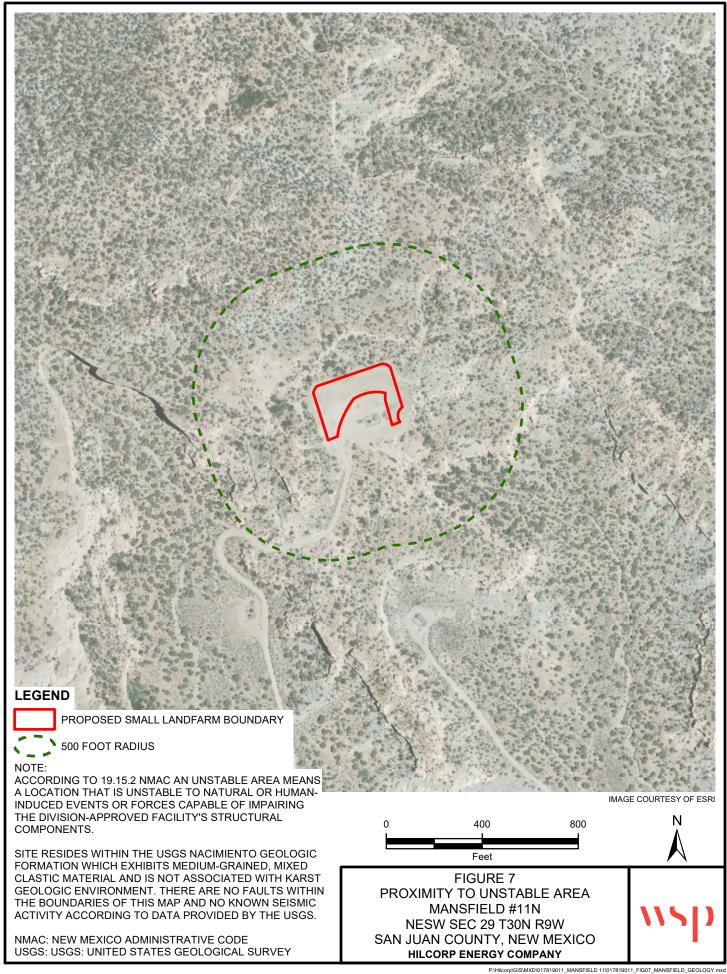
Mike,

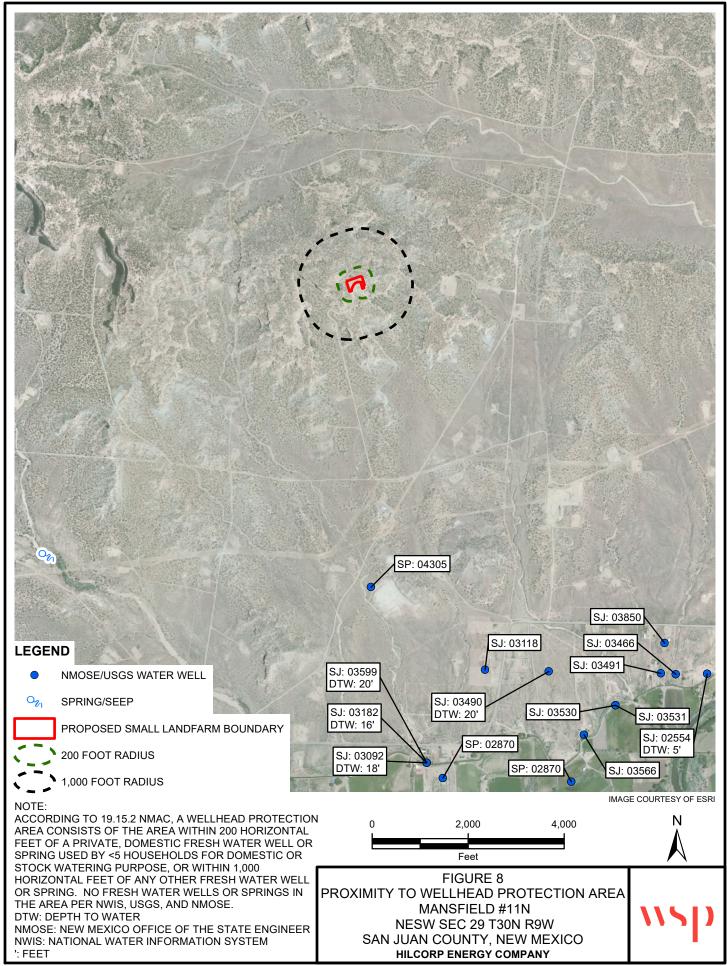
I am currently working on citing criteria for a new proposed facility for one of my clients and we have been asked to get in contact with you to confirm that there are no abandoned mines at the proposed location. I believe you have spoken to some of my colleagues about a similar task in the past. The coordinates for the facility are latitude 36.780400, longitude -107.807260 in San Juan County, NM between Aztec and Turley. Can you please respond and confirm that there are no abandoned mines at this location? Thank you, your help is much appreciated.

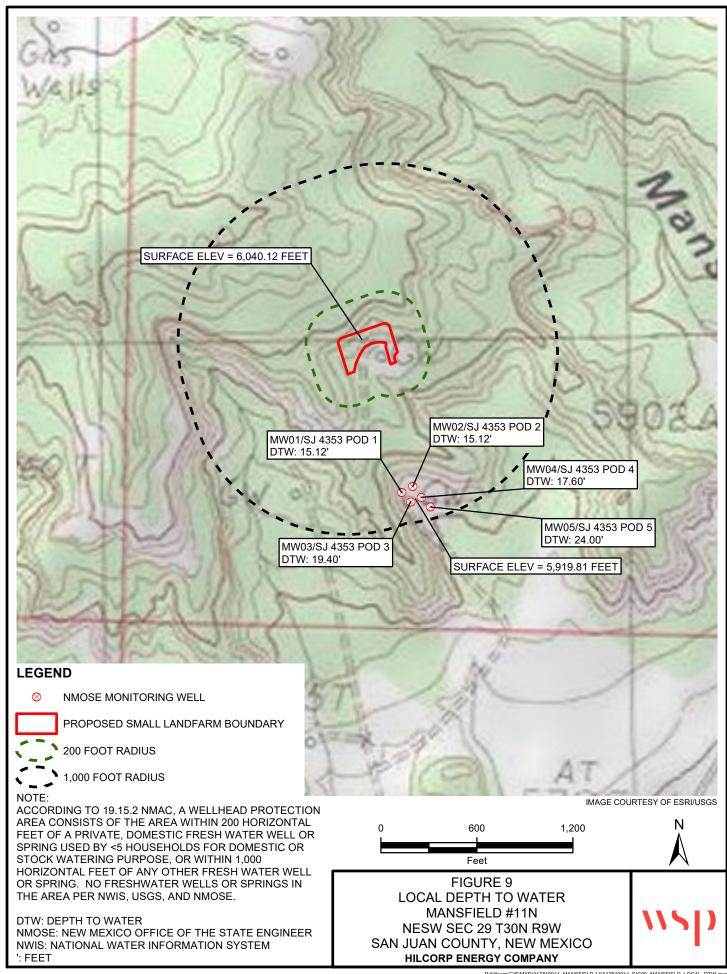


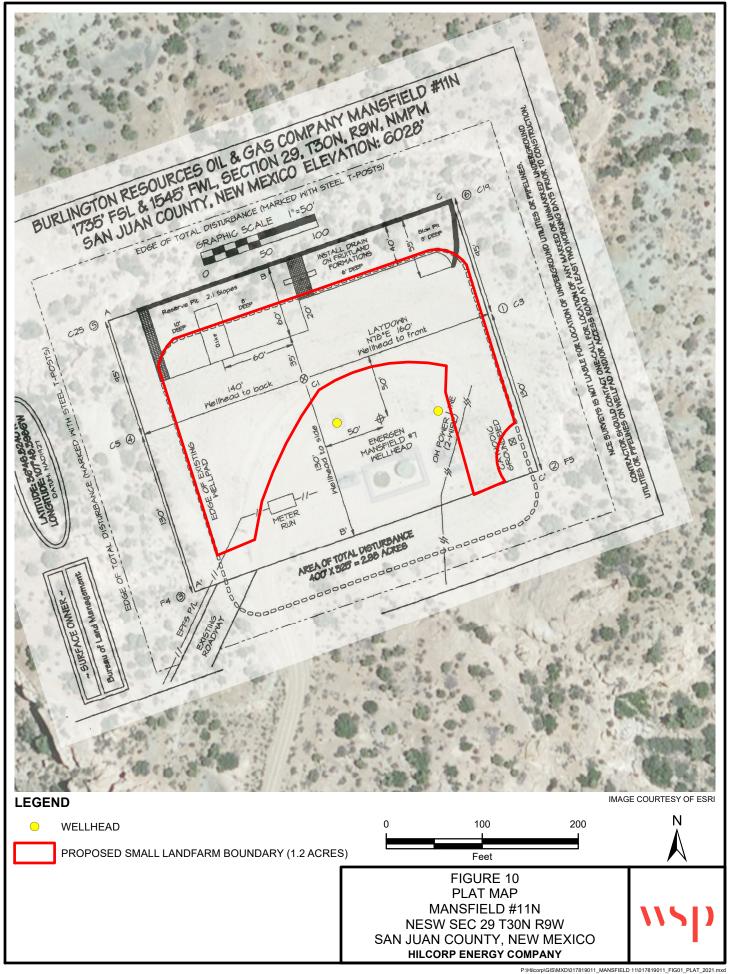
Joshua G. Adams, G.I.T.
Staff Geologist
970.456.5750 cell
970.385.1096 direct
848 East Second Avenue Durango, CO 81301
www.ltenv.com

Think before you print. Click for our email









District I 1625 N. French Dr., Hopps, NM 88240

State of New Mexico Energy, Minerals & Natural Resources Department

District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rip Brazos Rd., Aztec. NM 87410

State of New Mexico

gy Minerals & Natural Resources Department

OIL CONSERVATION DIVISION 2007

Form C-102

Revised October 12, 2005

Instructions on back

Submit to Approximate Lease - 4 Copies

State Lease - 3 Copies

Fee Lease - 3 Copies 1220 South St. Francis Dr. Santa Fe. NM B7505

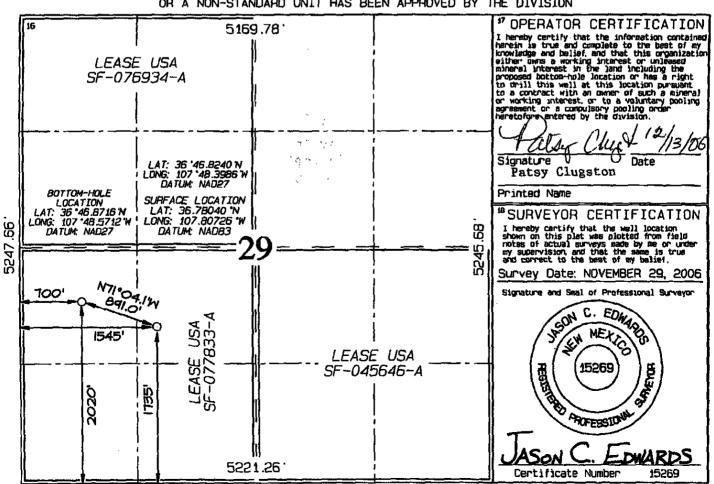
District IV 1220 S. St. Francis Dr. Santa Fe, NM 87505

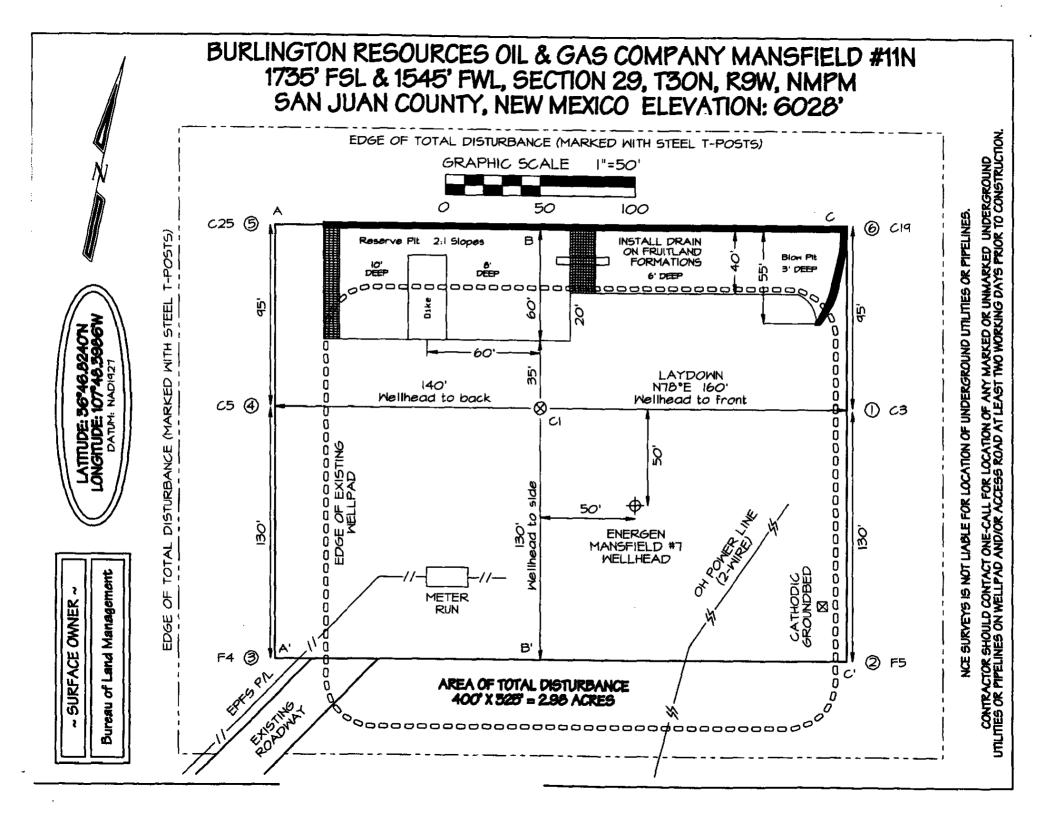
RECEIVED 210 FARMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

'API Number				Popl Cor	le		wew load,	ė				
30-045-34321 72319/7159					9 BLA	BLANCO MESAVERDE / BASIN DAKOTA						
*Property					Propert	у Нале		W	Well Number			
7284	}				MANSF	TELD	1	11N				
14538 BURLINGTON				NGTON F	'Operator Name ESOURCES OIL & GAS COMPANY, LP				*Elevation 6028			
				- *	¹⁰ Surface	Location						
UL or lat no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/Mest 1ine	County			
к	K 29 30N 9W 1735			1735	SOUTH	1545	WEST	SAN JUAN				
	11 Bottom Hole Location If Different From Surface											
UL or jet no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County			
) L	29	30N	9W		2020	SOUTH	700	WEST	SAN JUAN			
Dedicated Acres 320 MV		/320 DK	(S/2)		¹³ Joint or Infill	⁵⁴ Consolidation Code	¹⁵ Order No.	<u> </u>	· · · · · · · · · · · · · · · · · · ·			

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION





Form 3160-5 (June 2015)

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0137
Expires: January 31, 201

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٥.	Lease	Seriai	INO

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals

5.	If Indian, Allottee or Tribe Name	

	Use Form 3160-3 (Al								
SUBMIT IN T	TRIPLICATE - Other instru	octions on page 2			7. If Unit of CA/Agreement, Name and/or No.				
1. Type of Well									
Oil Well Gas W	Vell Other				8. Well Name and No.				
2. Name of Operator					9. API Well No.				
3a. Address		3b. Phone No. (inclu	ide area code)		10. Field and Pool or E	xploratory Area			
4. Location of Well (Footage, Sec., T.,R	2.,M., or Survey Description)				11. Country or Parish,	State			
12. CHE	CK THE APPROPRIATE BO	OX(ES) TO INDICA	 ΓΕ NATURE C	OF NOTION	CE. REPORT OR OTH	ER DATA			
TYPE OF SUBMISSION		()		OF ACT					
Notice of Intent	Acidize	Deepen			action (Start/Resume)	Water Shut-Off			
	Alter Casing	Hydraulic			mation	Well Integrity			
Subsequent Report	Casing Repair	New Cons	=		mplete	Other			
Final Abandonment Notice	Change Plans Convert to Injection	Plug and A Plug Back	=		oorarily Abandon r Disposal				
	tices must be filed only after	all requirements, incl				60-4 must be filed once testing has been e operator has detennined that the site			
		Title	;						
Signature Allas	Ker	Date)						
	THE SPACE	FOR FEDERA	L OR STA	TE OF	ICE USE				
Approved by									
			Title		מ	ate			
Conditions of approval, if any, are attack certify that the applicant holds legal or ewhich would entitle the applicant to con	equitable title to those rights i		Office						
Title 18 U.S.C Section 1001 and Title 43				and will	fully to make to any dep	partment or agency of the United States			

January 19, 2021

Bureau of Land Management Farmington Field Office 6251 College Boulevard Farmington, New Mexico 87402

RE: Request to Amend Conditions of Approval Hilcorp Energy Company
Mansfield #11 – NCS1913741281
San Juan County, New Mexico

To Whom It May Concern,

Following identification of a historical release by Hilcorp Energy Company (Hilcorp) at the Mansfield #11 natural gas production well, Hilcorp excavated approximately 2,000 cubic yards of soil and requested land use permission from the Bureau of Land Management (BLM) to remediate impacted soil via biopiling at the nearby Mansfield #11N, another well pad located on BLM surface with available space for remediation. Upon approval with conditions from the BLM, Hilcorp submitted a Revised Remediation Work Plan on February 19, 2020 to the New Mexico Oil Conservation Division (NMOCD). In response, the NMOCD is requiring Hilcorp to adhere to the requirements of the NMOCD small landfarm regulations (19.15.36.16 of the New Mexico Administrative Code [NMAC]), which differ slightly from the BLM conditions of approval (COAs) for the Site's biopiling work plan. The NMOCD has additionally requested that Hilcorp obtain acknowledgement from BLM of the differences between the NMOCD requirements and BLM's COAs. To comply with NMOCD's request, WSP USA Inc. (WSP) has attached for your review a table that summarizes the differences in the regulatory requirements and any proposed changes in landfarm construction, management, and closure based on compliance with 19.15.36.16 NMAC. In all but one case, Hilcorp will default to the more stringent of the BLM COAs and the NMOCD small landfarm regulations so that both regulatory directives can be met.

WSP has attempted to summarize the most significant differences below:

- Hilcorp will meet a closure standard for benzene of 0.2 milligrams per kilogram (mg/kg) as prescribed in the 19.15.36.16 NMAC instead of 10 mg/kg approved by the BLM. Hilcorp will comply with BLM's closure criteria of 100 mg/kg for TPH. Hilcorp will add NMOCD standards for BTEX, GRO+DRO, and chloride, which were not required by the BLM.
- Landfarm construction will comply with BLM requirements, but have stricter NMOCD constraints including:
 - The entire area will not exceed 2 acres,
 - Lift heights will be restricted to 8 inches instead of 24 inches,
 - No more than 2,000 cubic yards of soil will be treated.
- Due to the time it has taken to identify and comply with the NMOCD requirements, along with projected time to receive final approval to proceed from NMOCD, Hilcorp is requesting BLM change the timeline for remediation to three years from the landfarm application acceptance date instead of two years from the release date. Hilcorp will submit sundry notices to the BLM each year following the application acceptance from the NMOCD. The reports will include

laboratory analytical results soil sampling, evaluation of remediation progress, and anticipated timeline to closure.

As stated above, for NMOCD to proceed with approval of small landfarm registration, it requires BLM acknowledge differences between the BLM COAs and NMOCD small landfarm requirements and for BLM to approve of any modifications. All differences are summarized in the attached table and show the most stringent requirement will be met. Due to the extended timeline required to receive approval of a work plan from NMOCD and subsequent small landfarm registration, Hilcorp requests approval to modify the timeline in the original BLM COAs. Hilcorp respectfully requests extension of the timeline for remediation from two years from the date of the release to three years from the application acceptance date.

Upon approval of this Sundry, Hilcorp can proceed with the final steps required for NMOCD small landfarm registration and begin remediation at the site.

Sincerely,

Jennifer Deal

Gennifer Deal



U.S. Department of the Interior BUREAU OF LAND MANAGEMENT

Sundry Print Report

Well Name: MANSFIELD Well Location: T30N / R9W / SEC 29 / County or Parish/State: SAN

NESW / 36.780261 / 107.807377 JUAN / NM

Well Number: 11N Type of Well: CONVENTIONAL GAS Allottee or Tribe Name:

VELL

Lease Number: NMSF077833A Unit or CA Name: MANSFIELD, Unit or CA Number:

MANSFIELD - W/2 MV NMNM73156, NMNM74066

US Well Number: 3004534321 Well Status: Producing Gas Well Operator: HILCORP ENERGY

COMPANY

Subsequent Report

Type of Submission: Subsequent Report

Type of Action: Surface Disturbance

Date Operation Actually Began: 02/01/2021

Actual Procedure: Please see the attached Change of Plans. Attn: Ryan Joyner

SR Attachments

Actual Procedure

Sundry_Notice__Mansfield_11N_3160_005_1__20210210134541.pdf

 $Copy_of_Rule_36_BLM_COA_Comparison_JA_V2_20210210134541.pdf$

Mansfield_11N_COA_20210210134541.pdf

BLM_letter_for_Sundry_20210210134541.pdf

EC504488_20210210134541.pdf

Well Name: MANSFIELD Well Location: T30N / R9W / SEC 29 / County or Parish/State: SAN

NESW / 36.780261 / 107.807377

Well Number: 11N Type of Well: CONVENTIONAL GAS Allottee or Tribe Name:

WELL

Lease Number: NMSF077833A Unit or CA Name: MANSFIELD, Unit or CA Number:

MANSFIELD - W/2 MV NMNM73156, NMNM74066

US Well Number: 3004534321 Well Status: Producing Gas Well Operator: HILCORP ENERGY

COMPANY

JUAN / NM

Operator Certification

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a submission of Form 3160-5 or a Sundry Notice.

Operator Electronic Signature: WALKER Signed on: FEB 10, 2021 01:45 PM

Name: HILCORP ENERGY COMPANY

Title: Operations/Regulatory Technician

Street Address: 1111 TRAVIS STREET

City: HOUSTON State: TX

Phone: (713) 209-2400

Email address: NOT ENTERED

Field Representative

Representative Name: Jennifer Deal Street Address: 382 ROAD 3100

City: FARMINGTON State: NM Zip: 87401

Phone: (505)324-5128

Email address: jdeal@hilcorp.com

BLM Point of Contact

BLM POC Name: RYAN JOYNER BLM POC Title: Physical Scientist

BLM POC Phone: 9703851242 BLM POC Email Address: rjoyner@blm.gov

Disposition: Approved **Disposition Date:** 02/11/2021

Signature: Ryan Joyner