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

BGT 1

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: San Juan 28-7 Unit 58A – East Tank
API Number: 30-039-23983 OCD Permit Number:
U/L or Qtr/Qtr D Section 29 Township 28N Range 7W County: Rio Arriba
Center of Proposed Design: Latitude 36.637838 Longitude -107.603013 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: CRWhitehead **Approval Date:** October 20, 2021

Title: Environmental Specialist **OCD Permit Number:** BGT 1

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:** 3/1/2013

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): Kandis Roland Title: Operations/Regulatory Technician – Sr

Signature: Kandis Roland Date: 10/15/2021

e-mail address: kroland@hilcorp.com Telephone: (713) 757-5246

Hilcorp Energy Company
San Juan Basin: New Mexico Assets
Below Grade Tank Closure Report

Lease Name: San Juan 28-7 Unit 58A – East Tank
API No.: 30-039-23983

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 Requirements:

1. Prior to initiating any BGT closure, except in the case of an emergency, HILCORP will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or one week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.

   Historic record clean-up. Email communications with OCD are attached.

2. Notice of closure will be given to the District Division office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
   a. Operators Name
   b. Well Name and API Number
   c. Location

   Historic record clean-up. Email communications with OCD are attached.

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of HILCORP's approved Salt Water Disposal facilities or at a District Division approved facility.

   All recovered liquids were disposed of at an approved SWD facility or an approved District Division facility within 60 days of cessation of operation.

4. Solids and sludge's will be shoveled and/or vacuumed out for disposal at one of the District Division approved facilities, depending on the proximity of the BGT site: Envirotech Land Farm (Permit #NM-01-011), JFJ Land Farm % Industrial Ecosystems Inc. (Permit #NM-01-0010B), and Basin Disposal (Permit #NM-01-005).

   Any sludge or soil required to be removed to facilitate closure was transported to Envirotech Land Farm (Permit # NM-01-011) and/or JFJ Landfarm % IEI (Permit# NM-01-0010B).

5. HILCORP will obtain prior approval from District Division to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure

report. Steel materials will be recycled or reused as approved by the District Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste Management under NMED Permit SWM-052426.

The below-grade tank was disposed of in a division-approved manner. The liner was cleaned per 19.15.35.8.C(1)(m) NMAC and disposed of at the San Juan County Regional Landfill located on CR 3100.

6. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure, will be removed.

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

7. Following removal of the tank and any liner material, HILCORP will test the soils beneath the BGT as follows:
   a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
   b. The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13.

   A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Table I of 19.15.17.13 and the results are attached.

8. If the District Division and/or HILCORP determine there is a release, HILCORP will comply with 19.15.17.13.C.3b.

   A release was not determined for the above referenced well.

9. Upon completion of the tank removal, pursuant to 19.15.17.13.C.3c, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and to prevent ponding.

   The tank removal area passed all requirements of Table I of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material which included at least one foot of suitable material to establish vegetation at the site.

10. For those portions of the former BGT area no longer required for production activities, HILCORP will seed the disturbed area the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by

other District Division-approved methods. HILCORP will notify the District Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- Total percent plant cover of at least 70% of pre-disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19.15.17.13.H.5d HILCORP will comply with obligations imposed by other applicable federal or tribal agencies in which there re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

Provision 10 will be accomplished pursuant to 19.15.17.H.5d and notification will be submitted upon completion.

11. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

The former BGT area is required for production activities and reseeding will be completed upon plug and abandonment, per the procedure noted above.

Closure Report:
All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using District Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner and District Division) **(Attached)**
- Backfilling & cover installation **(See Report)**
- Confirmation Sampling Analytical Results **(Attached)**
- Application Rate & Seeding techniques **(See Report)**
- Photo Documentation of Reclamation **(Attached)**

Kandis Roland

From: Kandis Roland
Sent: Thursday, October 14, 2021 1:00 PM
To: Whitehead, Christopher , EMNRD
Cc: Mandi Walker; Kandis Roland
Subject: RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

Thanks Chris! I will file the C-144 Closure for the West Tank.

East Tank – A BGT permit was never filed. I am working on the registration that I will file through C-144LB and then I will file a C-144B Closure.

From: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Sent: Thursday, October 14, 2021 12:50 PM
To: Kandis Roland <kroland@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>
Subject: RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

I see, the concern here, that is acceptable. At that time, the remedial action would have occurred under the C-141 anyway, so the proper procedure was followed, but yes we do require the C-144 closure to announce that the action was taken through that process.

Will the East Tank also have its documentation submitted? I will go ahead and create the entry for the West tank on the well profile and label it BGT West with the expectation BGT East will be instead of the typical integer identifiers.

Christopher Whitehead ● Environmental Specialist
Environmental Bureau ● EMNRD - OCD

From: Kandis Roland <kroland@hilcorp.com>
Sent: Thursday, October 14, 2021 11:40 AM
To: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Cc: Mandi Walker <mwalker@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>
Subject: RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

Chris,

I agree this one is a mess. I am working on permitting the East tank as described below.

The West tank was permitted in 2008 and the scanned permit was uploaded to OCD 12/13/2019. The tank was removed after the C-141 closure in 2013 and replaced with an AGT. The C-144 BGT closure paperwork was never filed. Am I good to file the C-144 closure for this west tank using the sample report from 2013?

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan East/South Regulatory
713.757.5246

kroland@hilcorp.com

Kandis

From: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Sent: Tuesday, October 12, 2021 10:04 AM
To: Kandis Roland <kroland@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>
Subject: RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

Hello, it appears to be a fairly typical matter of complete compounded confusion. In general, if no closure action is being performed or simulated, then no notice is required. If I understand this correctly, the registration in the well file submitted 12/13/2019 is presumed to be for the west tank six years after closure was performed under a C-141 and a release identified so this BGT is resolved.

The east tank was not registered and its closure not submitted. Does a legacy registration exist for this BGT? Whatever records exist for this, the OCD should have these on file. If a legacy registration exists, please file it through the C-144LB form. If no registration exists, please create a new form with current signatures and dates but submit it through the C-144LB form. After the registration is submitted, please submit the historical closure report through the C-144B system. Please include this correspondence on any submissions associated with this BGT.

Christopher Whitehead ● Environmental Specialist
Environmental Bureau ● EMNRD - OCD

From: Kandis Roland <kroland@hilcorp.com>
Sent: Friday, October 8, 2021 1:00 PM
To: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Cc: Kandis Roland <kroland@hilcorp.com>; Mandi Walker <mwalker@hilcorp.com>
Subject: FW: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

Chris,

Here is another historical BGT that needs cleaned up.
COP closed out both BGTs and had samples done, see attached, but never filed a C-144 BGT closure.

West Tank – Tank was closed and sampled in 2013. I found a C-141 on OCD's website for this BGT, see attached. This tank also has a BGT permit on file as well. I was not able to find a 72 hr notice in COP records. There is currently an AGT where the BGT once was.

East Tank – See attached sample report found for this BGT. It was closed and sampled in 2013 as well. This tank was never registered as a BGT. Unable to find a 72 hr notice in COP records.

Can I file a closure report using the sample report attached and no 72 hr notice for the West Tank? For the East Tank, this was never registered as a BGT. Do I need to file any paper work for this tank?

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan East/South Regulatory

713.757.5246
kroland@hilcorp.com

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Friday, February 12, 2021 3:23 PM
To: Kandis Roland <kroland@hilcorp.com>; Kelly, Jonathan, EMNRD <Jonathan.Kelly@state.nm.us>
Cc: Cheryl Weston <cweston@hilcorp.com>
Subject: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 58A - INC

Kandis,

No I haven't.. I have 69 of these sites.. plus all of our normal other C-144.. I am getting flooded with these request.

Cory Smith • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1000 Rio Brazos | Aztec, NM 87410
505.334.6178 x115 | Cory.Smith@state.nm.us
http://www.emnrd.state.nm.us/OCD/

From: Kandis Roland <kroland@hilcorp.com>
Sent: Friday, February 12, 2021 2:03 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Kelly, Jonathan, EMNRD <Jonathan.Kelly@state.nm.us>
Cc: Cheryl Weston <cweston@hilcorp.com>; Kandis Roland <kroland@hilcorp.com>
Subject: [EXT] RE: SAN JUAN 28-7 UNIT 58A - INC

Cory,

Have you had a chance to review this? The INC for this is due 2/21/2021.

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan South Regulatory
505.324.5149
kroland@hilcorp.com

From: Kandis Roland
Sent: Friday, February 5, 2021 12:01 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; 'Kelly, Jonathan, EMNRD' <Jonathan.Kelly@state.nm.us>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: FW: SAN JUAN 28-7 UNIT 58A - INC

Cory,

COP closed out both BGTs and had samples done, see attached, but never filed a C-144 BGT closure.

West Tank – Tank was closed and sampled in 2013. I found a C-141 on OCD's website for this BGT, see attached. This tank also has a BGT permit on file as well. I was not able to find a 72 hr notice in COP records. There is currently an AGT where the BGT once was.

East Tank – See attached sample report found for this BGT. It was closed and sampled in 2013 as well. This tank was never registered as a BGT. Unable to find a 72 hr notice in COP records.

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan South Regulatory
505.324.5149
kroland@hilcorp.com

From: Clara Cardoza
Sent: Tuesday, November 24, 2020 8:28 AM
To: Kandis Roland <kroland@hilcorp.com>
Subject: RE: SAN JUAN 28-7 UNIT 58A - INC

I found two reports for the BGTs.

From: Kandis Roland
Sent: Tuesday, November 24, 2020 6:42 AM
To: Ryan Frost <rfrost@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>; Mark McKnight <mmcknight@hilcorp.com>; Trey Sullivan <tsullivan@hilcorp.com>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: SAN JUAN 28-7 UNIT 58A - INC

Today's Date:	11/24/2020				
Well Name:	SAN JUAN 28-7 UNIT 58A	**Location:**	Sec: 29	Twn: 028N	Rng: 0
API Number:	30.039.23983	**Footage:**	790' FNL & 790' FWL		
Operator:	Hilcorp Energy Company	**Area/Run/MSO:**	10	1006	Cliff Ha
Meter #:	95-777-01	**Pipeline:**	ENT		
INC Number:	cJK2032856523	**Agency:**	OCD	**Inspector:**	Jonathar
Type of INC:	Verbal	**Photos Required:**	**Yes**	**Due Date:**	
Issue of Concern:	- Review of prior inspections found that in 2011 inspection location had 2 BGTs prior to the #238N bei have been closed, no C-144 Closure permits in well file 1 BGT permit in well file.				

Kandis Roland
HILCORP ENERGY
San Juan South Regulatory
505.324.5149

kroland@hilcorp.com

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While all reasonable care has been taken to avoid the transmission of viruses, it is the responsibility of the recipient to ensure that the onward transmission, opening, or use of this message and any attachments will not adversely affect its systems or data. No responsibility is accepted by the company in this regard and the recipient should carry out such virus and other checks as it considers appropriate.

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While all reasonable care has been taken to avoid the transmission of viruses, it is the responsibility of the recipient to ensure that the onward transmission, opening, or use of this message and any attachments will not adversely affect its systems or data. No responsibility is accepted by the company in this regard and the recipient should carry out such virus and other checks as it considers appropriate.

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	

Release Notification

Responsible Party

Responsible Party Hilcorp Energy Company	OGRID 372171
Contact Name Kandis Roland	Contact Telephone (713) 757-5246
Contact email kroland@hilcorp.com	Incident # *(assigned by OCD)*
Contact mailing address 382 Road 3100 Aztec NM 87410	

Location of Release Source

Latitude 36.637838 Longitude -107.603013
(NAD 83 in decimal degrees to 5 decimal places)

Site Name San Juan 28-7 Unit 58A – East Tank	Site Type Gas Well
Date Release Discovered **N/A**	API# *(if applicable)* *30-039-23983*

Unit Letter	Section	Township	Range	County
D	29	28N	7W	Rio Arriba

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)
☐ 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)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

No release was encountered during the BGT Closure.

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? **N/A**

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Not Required

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: Kandis Roland Title: Operations/Regulatory Technician – Sr.

Signature: Kandis Roland Date: 10/15/2021

email: kroland@hilcorp.com Telephone: (713) 757-5246

OCD Only

Received by: _____ Date: _____

Animas Environmental Services, LLC
www.animasenvironmental.com
624 E. Comanche
Farmington, NM 87401
505-564-2281
Durango, Colorado
970-403-3084

April 12, 2013

Lisa Hunter
ConocoPhillips
San Juan Business Unit
Office 214-4
5525 Hwy 64
Farmington, New Mexico 87401

RE: East Below Grade Tank Closure Report
San Juan 28-7 #58A
Rio Arriba County, New Mexico

Dear Ms. Hunter:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the east below grade tank (BGT) closure at ConocoPhillips (CoP) San Juan 28-7 #58A, located in Rio Arriba County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – San Juan 28-7 #58A East BGT
Legal Description – NW¼ NW¼, Section 29, T28N, R7W, Rio Arriba County, New Mexico
Well Latitude/Longitude – N36.63766 and W107.60315, respectively
BGT Latitude/Longitude – N36.63784 and W107.60303, respectively
Land Jurisdiction – Bureau of Land Management (BLM)
Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, March 2013

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a pit remediation and closure report form dated November 2000 for the San Juan 28-7 #58A reported the depth to groundwater as less than 50 feet below ground surface (bgs). The New Mexico Office of the State Engineer (NMOSE) database was reviewed for nearby water wells, and no registered water wells were reported to be located within 1,000 feet of the location. Additionally, Google Earth and the New Mexico Tech Petroleum Recovery Research Center online mapping tool

(http://ford.nmt.edu/react/project.html) were accessed to aid in the identification of downgradient surface water.

Once on site, AES personnel further assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was less than 50 feet bgs. Carrizo Creek is located approximately 350 feet south of the location. Based on this information, the location was assessed a ranking score of 30.

1.3 BGT Closure Assessment

AES was initially contacted by Steve Welch, CoP representative, on February 28, 2013, and on March 1, 2013, Corwin Lameman and Kelsey Christiansen of AES mobilized to the location. AES personnel collected six soil samples from below the east BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On March 1, 2013, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the east BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Screening

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B;
- TPH as gasoline range organics (GRO) and diesel range organics (DRO) per USEPA Method 8015B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 0.1 ppm in S-2, S-3, and S-5 up to 0.3 ppm in S-4. Field TPH concentrations ranged from 27.5 mg/kg in S-1 up to 197 mg/kg in S-5. The field chloride concentration in SC-1 was 60 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results
San Juan 28-7 #58A East BGT Closure, March 2013

Sample ID	*Date Sampled*	*Depth below BGT (ft)*	*VOCs OVM Reading (ppm)*	*Field TPH (mg/kg)*	*Field Chlorides (mg/kg)*
NMOCD Action Level (NMAC 19.15.17.13E)			*--*	*100*	*250*
S-1	03/01/13	0.5	0.2	27.5	NA
S-2	03/01/13	0.5	0.1	40.0	NA
S-3	03/01/13	0.5	0.1	28.9	NA
S-4	03/01/13	0.5	0.3	66.5	NA
S-5	03/01/13	0.5	0.1	**197**	NA
SC-1	03/01/13	0.5	NA	NA	60

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.050 mg/kg and 0.25 mg/kg, respectively. TPH concentrations were reported below the laboratory detection limits of 5.0 mg/kg GRO and 9.8 mg/kg DRO. The laboratory chloride concentration was reported as 85 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Table 2. Soil Laboratory Analytical Results
San Juan 28-7 #58A East BGT Closure, March 2013

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action Level (NMAC 19.15.17.13E)			**0.2**	**50**	**100**		**250**
SC-1	03/01/13	0.5	<0.050	<0.25	<5.0	<9.8	85

NA - not analyzed

3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations exceeded the NMOCD action level of 100 mg/kg in one sample, S-5, with 197 mg/kg. However, laboratory analytical results for TPH (as GRO/DRO) in SC-1 were reported below the NMOCD action level of 100 mg/kg). Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the San Juan 28-7 #58A east BGT.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,

Landrea R. Cupps

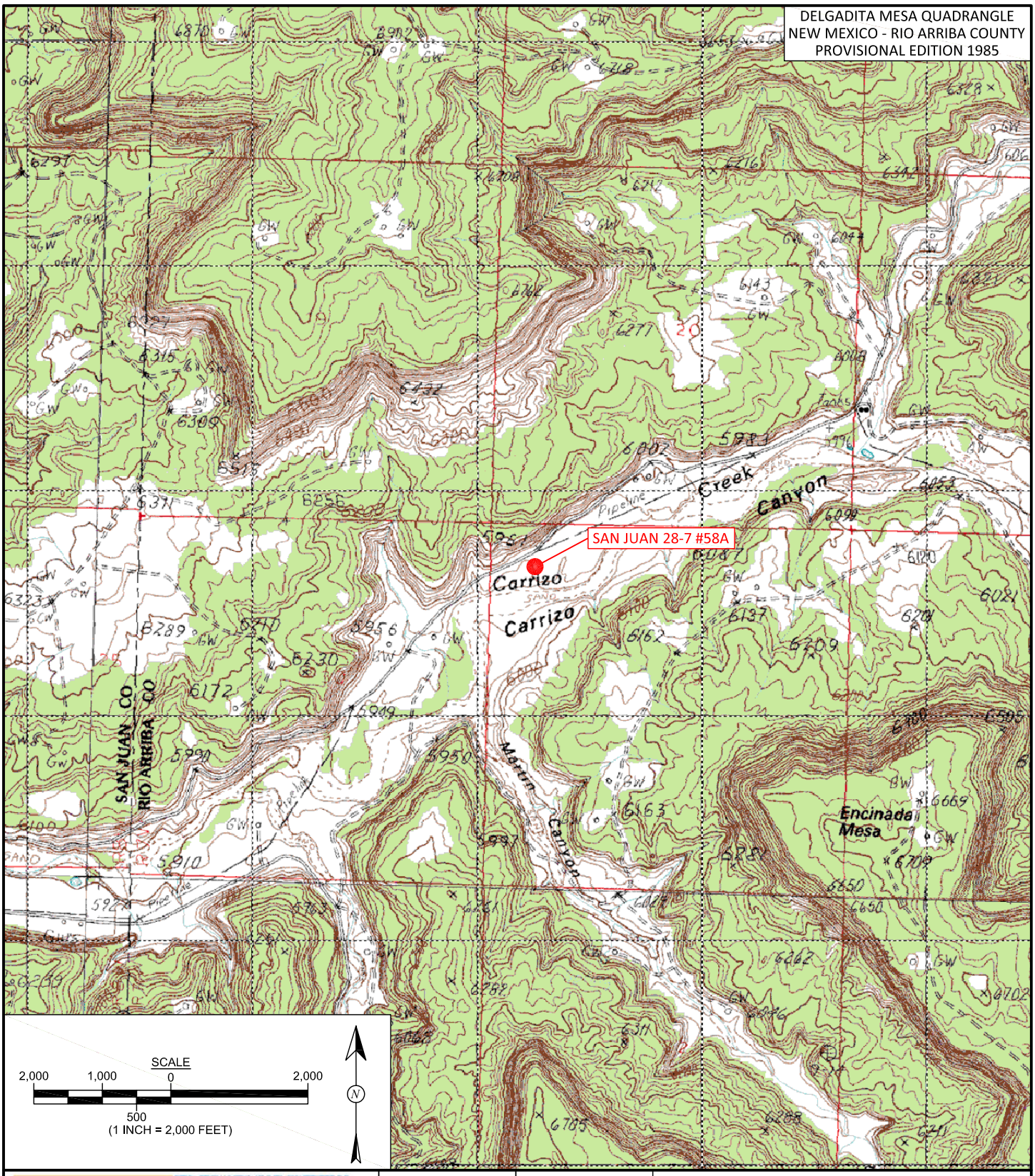
Landrea Cupps
Environmental Scientist

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, March 2013
AES Field Screening Report 030113
Hall Analytical Report 1303031

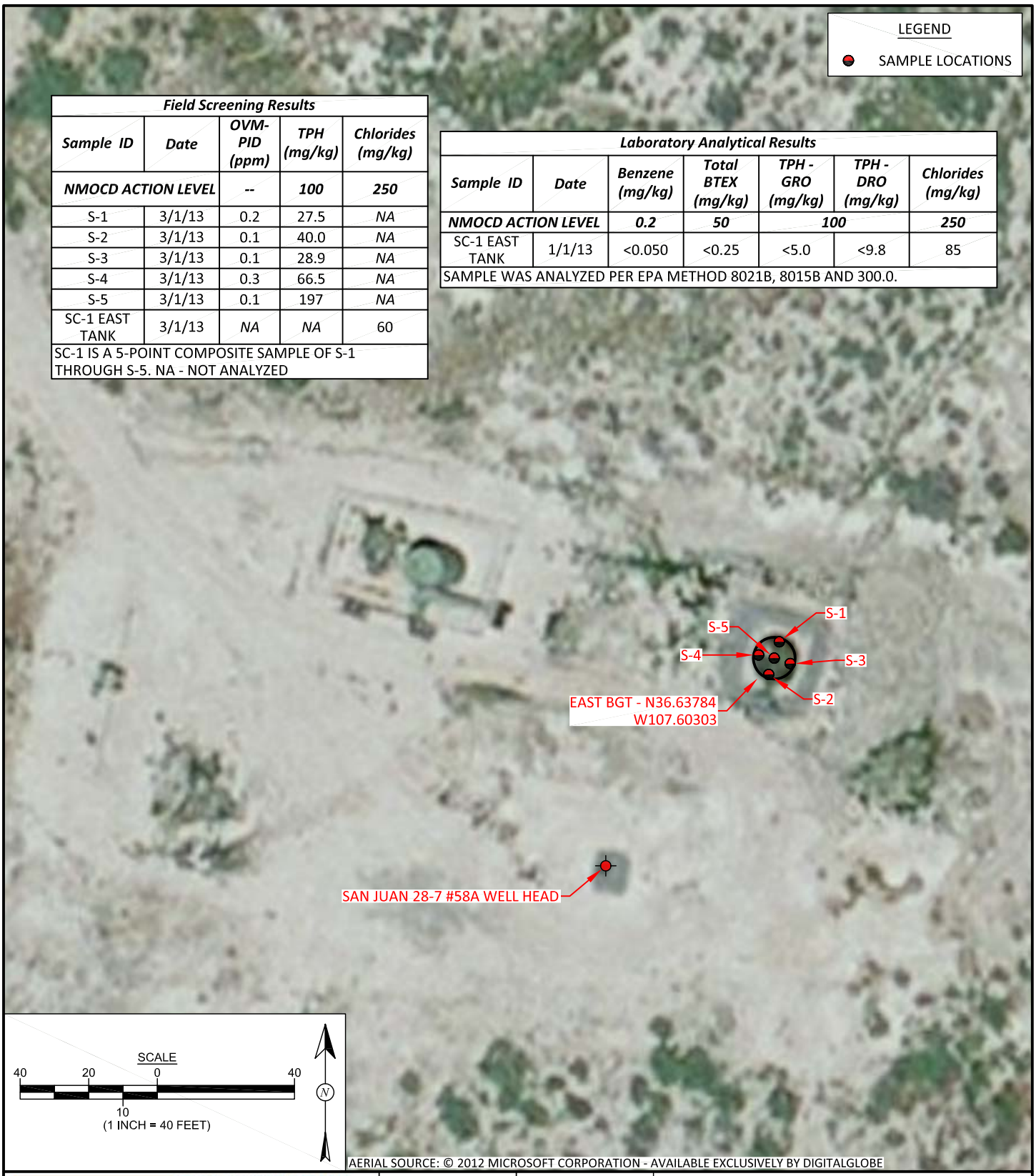
R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\SJ 28-7 #58A\BGT\San Juan 28-7 #58A East BGT Closure Report 041213.docx



Animas Environmental Services, LLC	**DRAWN BY:** C. Lameman	**DATE DRAWN:** April 3, 2013	**FIGURE 1**
	REVISIONS BY: C. Lameman	**DATE REVISED:** April 3, 2013	**TOPOGRAPHIC SITE LOCATION MAP** ConocoPhillips SAN JUAN 28-7 #58A NW¼ NW¼, SECTION 29, T28N, R7W RIO ARRIBA COUNTY, NEW MEXICO N36.63766, W107.60315
	CHECKED BY: D. Watson	**DATE CHECKED:** April 3, 2013	
	APPROVED BY: E. McNally	**DATE APPROVED:** April 3, 2013	

Field Screening Results				
Sample ID	Date	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		--	100	250
S-1	3/1/13	0.2	27.5	NA
S-2	3/1/13	0.1	40.0	NA
S-3	3/1/13	0.1	28.9	NA
S-4	3/1/13	0.3	66.5	NA
S-5	3/1/13	0.1	197	NA
SC-1 EAST TANK	3/1/13	NA	NA	60
SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5. NA - NOT ANALYZED				

Laboratory Analytical Results						
Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		0.2	50	100		250
SC-1 EAST TANK	1/1/13	<0.050	<0.25	<5.0	<9.8	85
SAMPLE WAS ANALYZED PER EPA METHOD 8021B, 8015B AND 300.0.						



Animas Environmental Services, LLC

DRAWN BY: C. Lameman	DATE DRAWN: April 3, 2013	**FIGURE 2**
REVISIONS BY: C. Lameman	DATE REVISED: April 3, 2013	**AERIAL SITE MAP** **EAST BELOW GRADE TANK CLOSURE** **MARCH 2013**
CHECKED BY: D. Watson	DATE CHECKED: April 3, 2013	ConocoPhillips SAN JUAN 28-7 #58A
APPROVED BY: E. McNally	DATE APPROVED: April 3, 2013	NW¼ NW¼, SECTION 29, T28N, R7W RIO ARRIBA COUNTY, NEW MEXICO N36.63766, W107.60315

AES Field Screening Report

Animas Environmental Services, LLC
www.animasenvironmental.com
624 E. Comanche
Farmington, NM 87401
505-564-2281
Durango, Colorado
970-403-3084

Client: ConocoPhillips

Project Location: San Juan 28-7 #58A East BGT

Date: 3/1/2013

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Location	OVM (ppm)	Field Chloride (mg/kg)	Field TPH Analysis Time	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-1	3/1/2013	12:05	North	0.2	NA	12:47	27.5	20.0	1	KC
S-2	3/1/2013	12:07	South	0.1	NA	12:51	40.0	20.0	1	KC
S-3	3/1/2013	12:10	East	0.1	NA	12:55	28.9	20.0	1	KC
S-4	3/1/2013	12:12	West	0.3	NA	12:59	66.5	20.0	1	KC
S-5	3/1/2013	12:15	Center	0.1	NA	13:39	197	20.0	1	KC
SC-1	3/1/2013	12:20	Composite	NA	60	*Not Analyzed for TPH.*				

PQL Practical Quantitation Limit
ND Not Detected at the Reporting Limit
NA Not Analyzed
DF Dilution Factor
**Field TPH concentrations recorded may be below PQL.*

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with Silver Nitrate
Total Petroleum Hydrocarbons - USEPA 418.1

Analyst: Kelsey Christensen

Report Finalized: 03/01/13

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

April 12, 2013

Debbie Watson

Animas Environmental Services
624 East Comanche
Farmington, NM 87401
TEL: (505) 486-4071
FAX

RE: San Juan 28-7 #58A OrderNo.: 1303031

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 2 sample(s) on 3/2/2013 for the analyses presented in the following report.

This report is a revised report and it replaces the original report issued March 05, 2013.

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. 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. All samples are reported as received unless otherwise indicated.

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

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1303031**
Date Reported: **4/12/2013**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services **Client Sample ID:** SC-1 East Tank
Project: San Juan 28-7 #58A **Collection Date:** 3/1/2013 12:20:00 PM
Lab ID: 1303031-001 **Matrix:** MEOH (SOIL) **Received Date:** 3/2/2013 12:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015D: DIESEL RANGE ORGANICS						Analyst: **MMD**
Diesel Range Organics (DRO)	ND	9.8		mg/Kg	1	3/4/2013 6:05:24 PM
Surr: DNOP	103	72.4-120		%REC	1	3/4/2013 6:05:24 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	3/4/2013 11:19:32 AM
Surr: BFB	89.7	84-116		%REC	1	3/4/2013 11:19:32 AM
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**
Benzene	ND	0.050		mg/Kg	1	3/4/2013 11:19:32 AM
Toluene	ND	0.050		mg/Kg	1	3/4/2013 11:19:32 AM
Ethylbenzene	ND	0.050		mg/Kg	1	3/4/2013 11:19:32 AM
Xylenes, Total	ND	0.10		mg/Kg	1	3/4/2013 11:19:32 AM
Surr: 4-Bromofluorobenzene	82.2	80-120		%REC	1	3/4/2013 11:19:32 AM
EPA METHOD 300.0: ANIONS						Analyst: **JRR**
Chloride	85	30		mg/Kg	20	3/4/2013 10:15:28 AM

Qualifiers:				
	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	P	Sample pH greater than 2	R	RPD outside accepted recovery limits
	RL	Reporting Detection Limit	S	Spike Recovery outside accepted recovery limits

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1303031**

12-Apr-13

Client: Animas Environmental Services

Project: San Juan 28-7 #58A

Sample ID	**MB-6301**	SampType:	**MBLK**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**PBS**	Batch ID:	**6301**	RunNo:	**8941**					
Prep Date:	**3/4/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255320**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-6301**	SampType:	**LCS**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**LCSS**	Batch ID:	**6301**	RunNo:	**8941**					
Prep Date:	**3/4/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255321**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	102	90	110			

Sample ID	**1303031-001BMS**	SampType:	**MS**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**SC-1 East Tank**	Batch ID:	**6301**	RunNo:	**8941**					
Prep Date:	**3/4/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255323**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	93	30	15.00	85.25	51.0	64.4	117			S

Sample ID	**1303031-001BMSD**	SampType:	**MSD**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**SC-1 East Tank**	Batch ID:	**6301**	RunNo:	**8941**					
Prep Date:	**3/4/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255324**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	100	30	15.00	85.25	113	64.4	117	9.56	20	

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
P	Sample pH greater than 2	R	RPD outside accepted recovery limits
RL	Reporting Detection Limit	S	Spike Recovery outside accepted recovery limits

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1303031**

12-Apr-13

Client: Animas Environmental Services

Project: San Juan 28-7 #58A

Sample ID **MB-6300**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **6300**	RunNo: **8953**
Prep Date: **3/4/2013**	Analysis Date: **3/4/2013**	SeqNo: **255779** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	9.9		10.00		99.0	72.4	120			

Sample ID **LCS-6300**	SampType: **LCS**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **6300**	RunNo: **8953**
Prep Date: **3/4/2013**	Analysis Date: **3/4/2013**	SeqNo: **255781** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	53	10	50.00	0	106	47.4	122			
Surr: DNOP	5.5		5.000		110	72.4	120			

Sample ID **1303034-001AMS**	SampType: **MS**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **BatchQC**	Batch ID: **6300**	RunNo: **8961**
Prep Date: **3/4/2013**	Analysis Date: **3/6/2013**	SeqNo: **257200** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	9.7	48.59	0	94.4	12.6	148			
Surr: DNOP	5.2		4.859		108	72.4	120			

Sample ID **1303034-001AMSD**	SampType: **MSD**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **BatchQC**	Batch ID: **6300**	RunNo: **8961**
Prep Date: **3/4/2013**	Analysis Date: **3/6/2013**	SeqNo: **257201** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	10	50.81	0	88.7	12.6	148	1.82	22.5	
Surr: DNOP	5.5		5.081		108	72.4	120	0	0	

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
P	Sample pH greater than 2	R	RPD outside accepted recovery limits
RL	Reporting Detection Limit	S	Spike Recovery outside accepted recovery limits

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1303031**

12-Apr-13

Client: Animas Environmental Services

Project: San Juan 28-7 #58A

Sample ID	**MB-6293**	SampType:	**MBLK**	TestCode:	**EPA Method 8015D: Gasoline Range**					
Client ID:	**PBS**	Batch ID:	**R8939**	RunNo:	**8939**					
Prep Date:	**3/1/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255803**	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	1100		1000		109	84	116			

Sample ID	**LCS-6293**	SampType:	**LCS**	TestCode:	**EPA Method 8015D: Gasoline Range**					
Client ID:	**LCSS**	Batch ID:	**R8939**	RunNo:	**8939**					
Prep Date:	**3/1/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255804**	Units:	**mg/Kg**			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	32	5.0	25.00	0	129	62.6	136			
Surr: BFB	1300		1000		133	84	116			S

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
P	Sample pH greater than 2	R	RPD outside accepted recovery limits
RL	Reporting Detection Limit	S	Spike Recovery outside accepted recovery limits

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1303031**

12-Apr-13

Client: Animas Environmental Services

Project: San Juan 28-7 #58A

Sample ID	**MB-6293**	SampType:	**MBLK**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**PBS**	Batch ID:	**R8939**	RunNo:	**8939**					
Prep Date:	**3/1/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255857**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			

Sample ID	**LCS-6293**	SampType:	**LCS**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**LCSS**	Batch ID:	**R8939**	RunNo:	**8939**					
Prep Date:	**3/1/2013**	Analysis Date:	**3/4/2013**	SeqNo:	**255858**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.89	0.050	1.000	0	89.2	80	120			
Toluene	0.89	0.050	1.000	0	88.9	80	120			
Ethylbenzene	0.89	0.050	1.000	0	89.0	80	120			
Xylenes, Total	2.7	0.10	3.000	0	88.5	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		112	80	120			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
P	Sample pH greater than 2	R	RPD outside accepted recovery limits
RL	Reporting Detection Limit	S	Spike Recovery outside accepted recovery limits

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: Animas Environmental Work Order Number: 1303031

Received by/date: AF 03/02/13

Logged By: **Lindsay Mangin** 3/2/2013 12:00:00 PM

Completed By: **Lindsay Mangin** 3/4/2013 8:06:26 AM

Reviewed By: LG 03/04/2013

Chain of Custody

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

Log In

4. Coolers are present? (see 19. for cooler specific information) Yes ☑ No ☐ NA ☐
5. Was an attempt made to cool the samples? Yes ☑ No ☐ NA ☐
6. Were all samples received at a temperature of >0° C to 6.0°C Yes ☑ No ☐ NA ☐
7. Sample(s) in proper container(s)? Yes ☑ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☑ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☑ No ☐
10. Was preservative added to bottles? Yes ☐ No ☑ NA ☐
11. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☑
12. Were any sample containers received broken? Yes ☐ No ☑
13. Does paperwork match bottle labels? (Note discrepancies on chain of custody) Yes ☑ No ☐
14. Are matrices correctly identified on Chain of Custody? Yes ☑ No ☐
15. Is it clear what analyses were requested? Yes ☑ No ☐
16. 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: _____

Special Handling (if applicable)

17. 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: _____

18. Additional remarks:

19. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.9	Good	Yes			

Chain-of-Custody Record

Client: Animas Environmental Services

Mailing Address: 624 E. Comanche Farmington NM 87401

Phone #: 564-2281

email or Fax#:

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

Accreditation
☐ NELAP ☐ Other

☐ EDD (Type)

Turn-Around Time:
☐ Standard ☒ Rush same day

Project Name: San Juan 28-7 #58A

Project #:

Project Manager: D. Watson

Sampler: KC & CL

On Ice: ☒ Yes ☐ No

Sample Temperature: 3.9

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1303031	BTEX + ~~MTBE~~ + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / ~~MRO~~)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (300.0)
3-1-13	1220	Soil	SG1 East Tank	MeOH/Kit 4oz jar	MeOH non	-001	X		X									X
3-1-13	1326	Soil	SC-2 West Tank			-002	X		X									X

Date:	Time:	Relinquished by:	Received by:	Date	Time
3-1-13	1651		Christine Walker	3/1/13	1651
3/1/13	1715	Christine Walker		3/2/13	12:00

Remarks: Bill to ConocoPhillips

WO: 10345859 UserID: BENALE

Act. Code: C200 ordered by: Steve Welch

Supervisor: Sheldon M. Area: 23 Run 355

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.

SJ 28-7 Unit 58A

3003923983

East BGT Closure

Historic BGT Closure Document clean-up. East BGT was closed 3/1/2013 but C-144 Closure document was never filed. Below is a current aerial shot of the BGT location.

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

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 56259
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	10/20/2021