

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 NMOC District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC 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
BGT 2 ☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Hilcorp Energy Company OGRID #: 372171
Address: 382 Road 3100 Aztec, NM 87410
Facility or well name: San Juan 28-7 Unit 194 BGT 2
API Number: 30-039-20630 OCD Permit Number: _____
U/L or Qtr/Qtr A Section 21 Township 28N Range 7W County: Rio Arriba
Center of Proposed Design: Latitude 36.65133 Longitude -107.57333 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 H₂S, 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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: CR Whitehead **Approval Date:** December 1, 2021

Title: Environmental Specialist **OCD Permit Number:** BGT 2

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:** 10/19/2012

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: 11/30/ 21

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 194 BGT 2
API No.: 30-039-20630

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. BGT was closed in 2012 see attached email.

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. BGT was closed in 2012 see attached email.

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).

Revised 10/14/2015

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.

Revised 10/14/2015

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)**

Revised 10/14/2015

Kandis Roland

From: Kandis Roland
Sent: Tuesday, November 30, 2021 1:36 PM
To: Whitehead, Christopher , EMNRD
Cc: Mandi Walker; Kandis Roland
Subject: RE: [EXTERNAL] FW: SAN JUAN 28-7 UNIT 194 3003920630

Chris,

That is correct. No historical forms exists. I will file Closure Only Plan and a C-144 BGT Closure permit through C-144LB and will refer to the BGT as "BGT 2" for the historical BGT. I will let you know once this is completed.

Thank you,

Kandis Roland
HILCORP ENERGY
San Juan East/South Regulatory
713.757.5246
kroland@hilcorp.com

From: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Sent: Tuesday, November 30, 2021 10:53 AM
To: Kandis Roland <kroland@hilcorp.com>
Cc: Mandi Walker <mwalker@hilcorp.com>
Subject: RE: [EXTERNAL] FW: SAN JUAN 28-7 UNIT 194 3003920630

To clarify the issue, there is currently one registered BGT at this well site listed as BGT 1 in E-permitting; presumably, this is the one still in service since it was permitted in 2016. As a result, please submit any info regarding the historical BGT as BGT 2 if identifiers are used. Regarding the historical BGT, is there a legacy form found for this or would the Closure Plan be on a current form? If no historical form exists, yes please submit a registration as a closure plan only. Since this is all completing the record, go ahead and file this through C-144LB.

Christopher Whitehead • Environmental Specialist
Environmental Bureau • EMNRD - OCD

From: Kandis Roland <kroland@hilcorp.com>
Sent: Tuesday, November 30, 2021 9:34 AM
To: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Cc: Kandis Roland <kroland@hilcorp.com>; Mandi Walker <mwalker@hilcorp.com>
Subject: [EXTERNAL] FW: SAN JUAN 28-7 UNIT 194 3003920630

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

Chris,

I am working this historic BGT issue. COP had two BGTs on this location.

1st BGT (36.65133, -107.57333) was never permitted but was closed in 2012. I found the sample report, attached, from the closure. Do I need to file a BGT Closure Only plan for this well since it was never permitted before I file the historical C-144 BGT closure ?

2nd BGT (36.651285, -107.573251) has no issues. It is currently in use and was permitted in 2016.

Thanks,

Kandis Roland
HILCORP ENERGY
San Juan East/South Regulatory
713.757.5246
kroland@hilcorp.com

From: Kandis Roland <kroland@hilcorp.com>
Sent: Friday, February 12, 2021 3:02 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: RE: SAN JUAN 28-7 UNIT 194 3003920630

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 12:40 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 194 3003920630

Cory,

COP closed out this BGT and sampled it in 2012. This BGT was never permitted and I was unable to find any record of a 72 hr notice in COP well files. Will this soil sample suffice for the BGT closure permit?

Thanks,

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

From: Clara Cardoza
Sent: Tuesday, November 24, 2020 8:01 AM
To: Kandis Roland <kroland@hilcorp.com>; Mark McKnight <mmcknight@hilcorp.com>; Ryan Frost <rfrost@hilcorp.com>; Trey Sullivan <tsullivan@hilcorp.com>
Cc: Cheryl Weston <cweston@hilcorp.com>
Subject: RE: SAN JUAN 28-7 UNIT 194 - INC

See attached sampling report.

Thank you,
Clara

From: Kandis Roland
Sent: Tuesday, November 24, 2020 7:16 AM
To: Mark McKnight <mmcknight@hilcorp.com>; Ryan Frost <rfrost@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>; Trey Sullivan <tsullivan@hilcorp.com>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: SAN JUAN 28-7 UNIT 194 - INC

Today's Date:	11/24/2020				
Well Name:	SAN JUAN 28-7 UNIT 194	Location:	Sec: 21	Twn: 028N	Rng: C
API Number:	30.039.20630	Footage:	1013' FNL & 1070' FEL		
Operator:	Hilcorp Energy Company	Area/Run/MSO:	10	1006	Cliff H
Meter #:	87-723-01		Pipeline:	ENT	
INC Number:	cJK2032858349	Agency:	OCD	Inspector:	Jonatha
Type of INC:	Verbal	Photos Required:	Yes	Due Date:	
Issue of Concern:	2012 inspection indicated 2 below grade tanks, following inspections only indicated 1. Review of historic Google Earth found that location did have 2 BGTs in 2011 image then only 1 in 2013 image, BGT closure for closed BGT per 19.15.17 NMAC. Only 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.

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 36.65133 Longitude -107.57333
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	San Juan 28-7 Unit 194 BGT 2	Site Type	Gas Well
Date Release Discovered	N/A	API# (if applicable)	30-039-20630

Unit Letter	Section	Township	Range	County
A	21	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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

No release was encountered during the BGT Closure.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> 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: <u>Kandis Roland</u> Title: <u>Operations/Regulatory Technician – Sr.</u> Signature: <u>Kandis Roland</u> Date: <u>11/30/2021</u> email: <u>kroland@hilcorp.com</u> Telephone: <u>(713) 757-5246</u>
<u>OCD Only</u> Received by: _____ Date: _____



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche
Farmington, NM 87401
505-564-2281

Durango, Colorado
970-403-3274

October 19, 2012

Ashley Maxwell
ConocoPhillips
San Juan Business Unit
Office 216-2
5525 Hwy 64
Farmington, New Mexico 87401

**RE: Below Grade Tank Closure Report
San Juan 28-7 #194
Rio Arriba County, New Mexico**

Dear Ms. Maxwell:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) San Juan 28-7 #194, located in Rio Arriba County, New Mexico. Tank removal was completed by CoP contractors while AES was on site.

1.0 Site Information

1.1 Location

Site Name – San Juan 28-7 #194

Legal Description – NE¼ NE¼, Section 21, T28N, R7W, Rio Arriba County, New Mexico

Well Latitude/Longitude – N36.65111 and W107.57358, respectively

BGT Latitude/Longitude – N36.65133 and W107.57333, respectively

Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1 – Topographic Site Location Map

Figure 2 – Aerial Site Map, August 2012

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 dated February 11, 2000, reported depth to groundwater as greater than 100 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

Ashley Maxwell
SJ 28-7 #194 BGT Closure Report
October 19, 2012
Page 2 of 5

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 greater than 100 feet bgs. An unnamed ephemeral wash is located approximately 30 feet north of the location and drains northwest to Delgadita Canyon. Based on this information, the location was assessed a ranking score of 20.

1.3 BGT Closure Assessment

AES was initially contacted by Sheldon Montoya, CoP representative, on August 14, 2012, and on the same day, Heather Woods and Zachary Trujillo of AES mobilized to the location.

AES personnel collected six soil samples from the below the 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 August 14, 2012, 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 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 hydrocarbons (TPH). Soil sample SC-1 was field screened for chlorides and 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 for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point

Ashley Maxwell
 SJ 28-7 #194 BGT Closure Report
 October 19, 2012
 Page 3 of 5

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;
- Total petroleum hydrocarbons (TPH) for gasoline range organics (GRO) and diesel range organics (DRO) per USEPA Method 8015B;
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening for VOCs via OVM showed readings ranging from 0.4 ppm in S-3 up to 1.7 ppm in SC-1. Field TPH concentrations ranged from 75.4 mg/kg in S-1 up to 102 mg/kg in S-3. The field chloride concentration in SC-1 was 40 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
 SJ 28-7 #194 BGT Closure, August 2012

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
NMOCB Action Level (NMAC 19.15.17.13E)			--	100	250
S-1	8/14/12	0.5	1.2	75.4	NA
S-2	8/14/12	0.5	0.9	92.9	NA
S-3	8/14/12	0.5	0.4	102	NA
S-4	8/14/12	0.5	0.5	86.2	NA

Ashley Maxwell
 SJ 28-7 #194 BGT Closure Report
 October 19, 2012
 Page 4 of 5

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
NMOCD Action Level (NMAC 19.15.17.13E)			--	100	250
S-5	8/14/12	0.5	0.5	91.6	NA
SC-1	8/14/12	0.5	1.7	NA	40

NA = not analyzed

Laboratory analytical results showed that the benzene and total BTEX concentrations in SC-1 were reported below laboratory detection limits of 0.050 mg/kg and 0.25 mg/kg, respectively. TPH concentrations were reported as less than 5.0 mg/kg GRO and less than 10 mg/kg DRO. The laboratory chloride concentration was below the laboratory detection limit of 30 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, SJ 28-7 #194 BGT Closure, August 2012

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth (ft)</i>	<i>Benzene (mg/kg)</i>	<i>BTEX (mg/kg)</i>	<i>TPH-GRO (mg/kg)</i>	<i>TPH-DRO (mg/kg)</i>	<i>Chlorides (mg/kg)</i>
NMOCD Action Level (NMAC 19.15.17.13E)			0.2	50	100	100	250
SC-1	8/14/12	0.5	<0.050	<0.25	<5.0	<10	<30

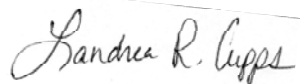
3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Benzene concentrations in SC-1 were reported below the laboratory detection limit of 0.050 mg/kg, and total BTEX concentrations were below the NMOCD action level of 50 mg/kg. Field TPH concentrations exceeded the NMOCD action level of 100 mg/kg in S-3 with 102 mg/kg; however, laboratory analytical results for TPH as GRO/DRO were reported below the NMOCD action level of 100 mg/kg. The chloride concentration in SC-1 was reported 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.

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

Ashley Maxwell
SJ 28-7 #194 BGT Closure Report
October 19, 2012
Page 5 of 5

Sincerely,



Landrea Cupps
Environmental Scientist



Elizabeth McNally, P.E.

Attachments:

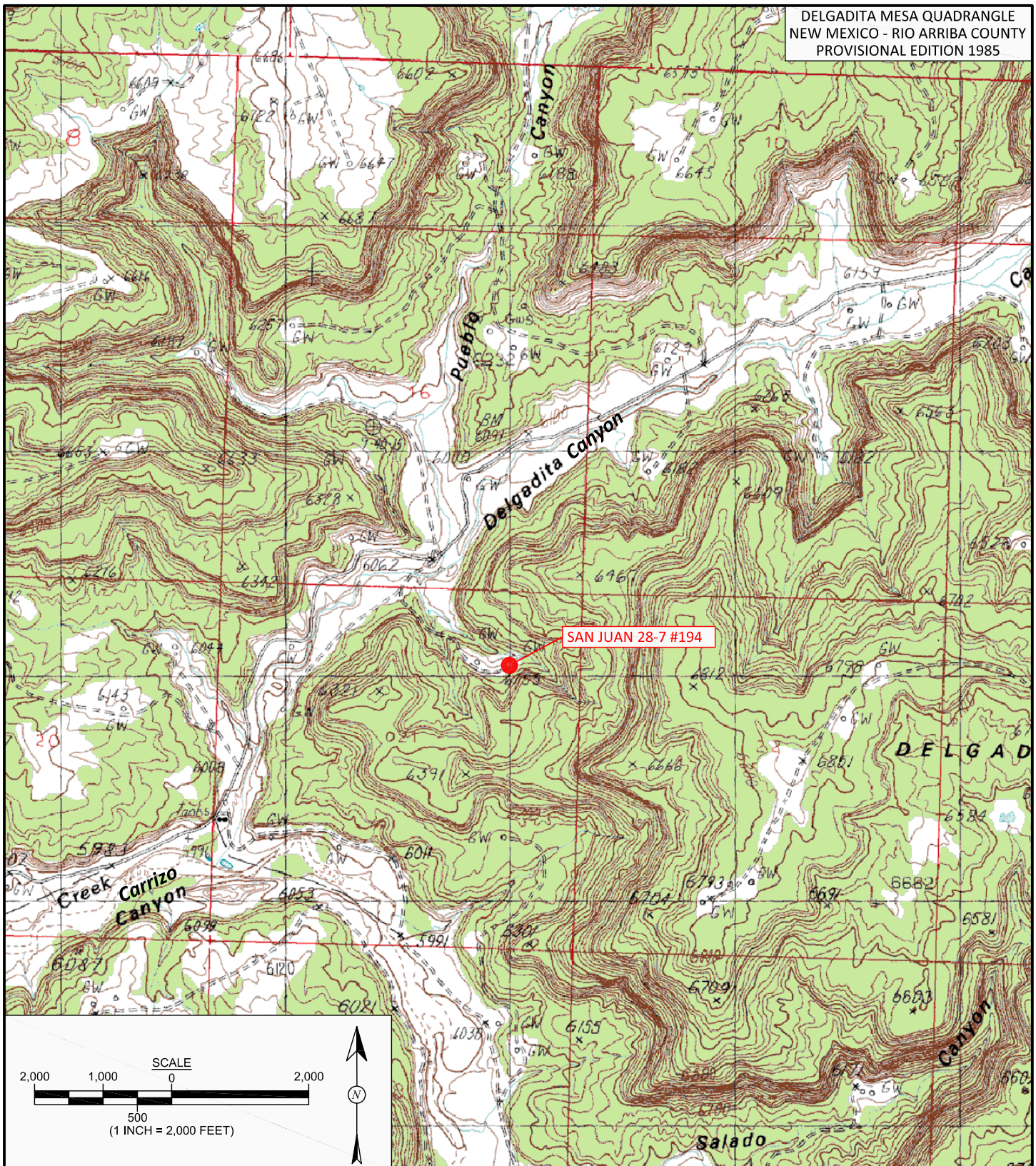
Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, August 2012

AES Field Screening Report 081412

Hall Analytical Report 1208651

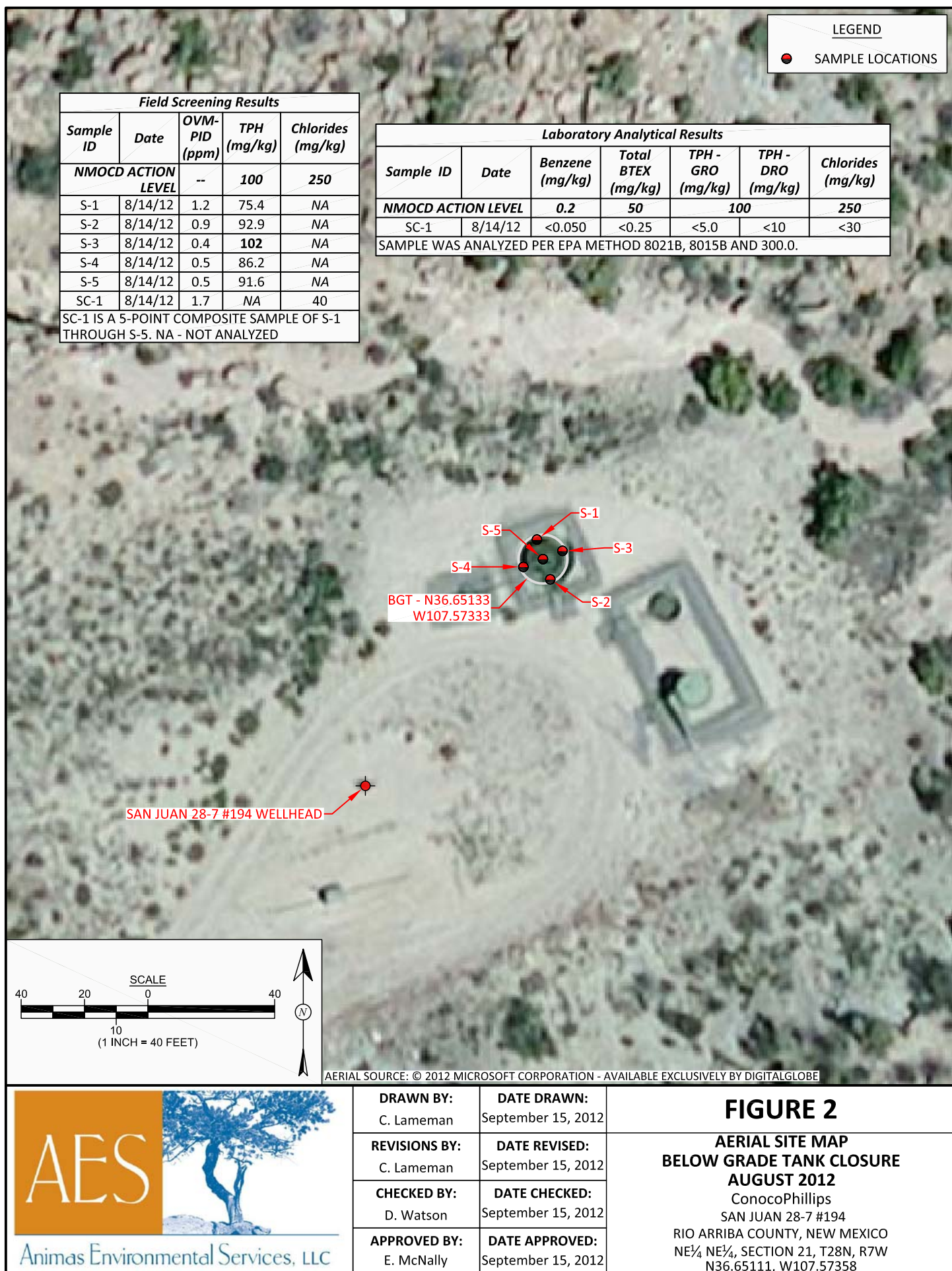
R:\Animas 2000\2012 Projects\Conoco Phillips\SJ 28-7 #194\San Juan 28-7 #194 BGT Closure Report 101912.docx



DRAWN BY: C. Lameman	DATE DRAWN: September 15, 2012
REVISIONS BY: C. Lameman	DATE REVISED: September 15, 2012
CHECKED BY: D. Watson	DATE CHECKED: September 15, 2012
APPROVED BY: E. McNally	DATE APPROVED: September 15, 2012

FIGURE 1

TOPOGRAPHIC SITE LOCATION MAP
ConocoPhillips
SAN JUAN 28-7 #194
RIO ARRIBA COUNTY, NEW MEXICO
NE¼ NE¼, SECTION 21, T28N, R7W
N36.65111, W107.57358



AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche
Farmington, NM 87401
505-564-2281

Durango, Colorado
970-403-3274

Client: ConocoPhillips

Project Location: San Juan 28-7 #194

Date: 8/14/2012

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	8/14/2012	11:39	North	1.2	NA	12:35	75.4	20.0	1	HMW
S-2	8/14/2012	11:41	South	0.9	NA	12:39	92.9	20.0	1	HMW
S-3	8/14/2012	11:43	East	0.4	NA	12:43	102	20.0	1	HMW
S-4	8/14/2012	11:45	West	0.5	NA	12:47	86.2	20.0	1	HMW
S-4	8/13/2012	11:47	Center	0.5	NA	12:50	91.6	20.0	1	HMW
SC-1	8/14/2012	11:55	Composite	1.7	40	Not Analyzed for TPH.				

PQL Practical Quantitation Limit

ND Not Detected at the Reporting Limit

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:

Leather M. Woods



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

August 20, 2012

Ross Kennemer
Animas Environmental Services
624 East Comanche
Farmington, NM 87401
TEL: (505) 486-1776
FAX (505) 324-2022

RE: COP SJ 28-7 #194

OrderNo.: 1208651

Dear Ross Kennemer:

Hall Environmental Analysis Laboratory received 1 sample(s) on 8/15/2012 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. 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. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1208651

Date Reported: 8/20/2012

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services

Client Sample ID: SC-1

Project: COP SJ 28-7 #194

Collection Date: 8/14/2012 11:55:00 AM

Lab ID: 1208651-001

Matrix: MEOH (SOIL)

Received Date: 8/15/2012 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: JMP
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	8/15/2012 10:35:51 AM
Surr: DNOP	122	77.6-140		%REC	1	8/15/2012 10:35:51 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	8/15/2012 12:30:20 PM
Surr: BFB	97.2	84-116		%REC	1	8/15/2012 12:30:20 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	0.050		mg/Kg	1	8/15/2012 12:30:20 PM
Toluene	ND	0.050		mg/Kg	1	8/15/2012 12:30:20 PM
Ethylbenzene	ND	0.050		mg/Kg	1	8/15/2012 12:30:20 PM
Xylenes, Total	ND	0.10		mg/Kg	1	8/15/2012 12:30:20 PM
Surr: 4-Bromofluorobenzene	101	80-120		%REC	1	8/15/2012 12:30:20 PM
EPA METHOD 300.0: ANIONS						Analyst: SRM
Chloride	ND	30		mg/Kg	20	8/15/2012 11:25:37 AM

Qualifiers:

* / X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

R RPD outside accepted recovery limits

S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Detection Limit

U Samples with CalcVal < MDL

Page 1 of 5

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1208651

20-Aug-12

Client: Animas Environmental Services**Project:** COP SJ 28-7 #194

Sample ID	MB-3335	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	3335	RunNo:	4894					
Prep Date:	8/15/2012	Analysis Date:	8/15/2012	SeqNo:	138389	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-3335	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	3335	RunNo:	4894					
Prep Date:	8/15/2012	Analysis Date:	8/15/2012	SeqNo:	138390	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	95.2	90	110			

Sample ID	1208651-001BMS	SampType:	MS	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-1	Batch ID:	3335	RunNo:	4894					
Prep Date:	8/15/2012	Analysis Date:	8/15/2012	SeqNo:	138392	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	30	15.00	7.090	82.4	64.4	117			

Sample ID	1208651-001BMSD	SampType:	MSD	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-1	Batch ID:	3335	RunNo:	4894					
Prep Date:	8/15/2012	Analysis Date:	8/15/2012	SeqNo:	138393	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	30	15.00	7.090	81.8	64.4	117	0	20	

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.
 E Value above quantitation range
 J Analyte detected below quantitation limits
 R RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 ND Not Detected at the Reporting Limit
 RL Reporting Detection Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1208651

20-Aug-12

Client: Animas Environmental Services**Project:** COP SJ 28-7 #194

Sample ID MB-3316	SampType: MBLK		TestCode: EPA Method 8015B: Diesel Range Organics							
Client ID: PBS	Batch ID: 3316		RunNo: 4864							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 137376		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	12		10.00		118	77.6	140			

Sample ID LCS-3316	SampType: LCS		TestCode: EPA Method 8015B: Diesel Range Organics							
Client ID: LCSS	Batch ID: 3316		RunNo: 4864							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 137530		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	35	10	50.00	0	69.3	52.6	130			
Surr: DNOP	4.7		5.000		93.2	77.6	140			

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.
 E Value above quantitation range
 J Analyte detected below quantitation limits
 R RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 ND Not Detected at the Reporting Limit
 RL Reporting Detection Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1208651

20-Aug-12

Client: Animas Environmental Services**Project:** COP SJ 28-7 #194

Sample ID MB-3315	SampType: MBLK			TestCode: EPA Method 8015B: Gasoline Range						
Client ID: PBS	Batch ID: 3315			RunNo: 4880						
Prep Date: 8/14/2012	Analysis Date: 8/15/2012			SeqNo: 138533		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	960		1000		95.9	84	116			

Sample ID LCS-3315	SampType: LCS			TestCode: EPA Method 8015B: Gasoline Range						
Client ID: LCSS	Batch ID: 3315			RunNo: 4880						
Prep Date: 8/14/2012	Analysis Date: 8/15/2012			SeqNo: 138534		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	91.7	74	117			
Surr: BFB	990		1000		99.4	84	116			

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.
 E Value above quantitation range
 J Analyte detected below quantitation limits
 R RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 ND Not Detected at the Reporting Limit
 RL Reporting Detection Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1208651

20-Aug-12

Client: Animas Environmental Services**Project:** COP SJ 28-7 #194

Sample ID MB-3315	SampType: MBLK		TestCode: EPA Method 8021B: Volatiles							
Client ID: PBS	Batch ID: 3315		RunNo: 4880							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 138545		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	0.98		1.000		98.5	80	120			

Sample ID LCS-3315	SampType: LCS		TestCode: EPA Method 8021B: Volatiles							
Client ID: LCSS	Batch ID: 3315		RunNo: 4880							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 138546		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.91	0.050	1.000	0	91.0	76.3	117			
Toluene	0.92	0.050	1.000	0	92.2	80	120			
Ethylbenzene	0.97	0.050	1.000	0	96.7	77	116			
Xylenes, Total	2.9	0.10	3.000	0	96.6	76.7	117			
Surr: 4-Bromofluorobenzene	1.1		1.000		105	80	120			

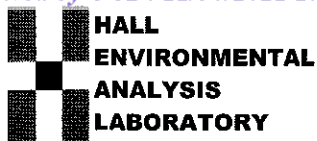
Sample ID 1208590-001AMS	SampType: MS		TestCode: EPA Method 8021B: Volatiles							
Client ID: BatchQC	Batch ID: 3315		RunNo: 4880							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 138549		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.94	0.048	0.9524	0	98.3	67.2	113			
Toluene	0.94	0.048	0.9524	0	98.5	62.1	116			
Ethylbenzene	0.97	0.048	0.9524	0	102	67.9	127			
Xylenes, Total	2.9	0.095	2.857	0	100	60.6	134			
Surr: 4-Bromofluorobenzene	1.0		0.9524		106	80	120			

Sample ID 1208590-001AMSD	SampType: MSD		TestCode: EPA Method 8021B: Volatiles							
Client ID: BatchQC	Batch ID: 3315		RunNo: 4880							
Prep Date: 8/14/2012	Analysis Date: 8/15/2012		SeqNo: 138550		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.92	0.048	0.9506	0	96.6	67.2	113	1.94	14.3	
Toluene	0.93	0.048	0.9506	0	98.0	62.1	116	0.635	15.9	
Ethylbenzene	0.95	0.048	0.9506	0	100	67.9	127	1.84	14.4	
Xylenes, Total	2.9	0.095	2.852	0	101	60.6	134	0.292	12.6	
Surr: 4-Bromofluorobenzene	1.0		0.9506		108	80	120	0	0	

Qualifiers:

*X Value exceeds Maximum Contaminant Level.
 E Value above quantitation range
 J Analyte detected below quantitation limits
 R RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 ND Not Detected at the Reporting Limit
 RL Reporting Detection Limit



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87105
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: Animas Environmental

Work Order Number: 1208651

Received by/date: AG

8/15/12

Logged By: Lindsay Mangin

8/15/2012 10:00:00 AM

Lindsay Mangin

Completed By: Lindsay Mangin

8/15/2012 10:08:46 AM

Lindsay Mangin

Reviewed By: mg

8/15/12

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 $>0^{\circ}\text{C}$ 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 ☐ # of preserved bottles checked for pH:
(<2 or >12 unless noted)
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐ Adjusted?
Adjusted?
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 ☐ 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	1.0	Good	Yes			

San Juan 28-7 Unit 194 BGT 2

Record Clean Up: Historic BGT Closure

BGT was closed out in 2012 but a C-144 BGT closure permit was never filed. Below is a current image of the BGT closure site.



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

QUESTIONS

Action 64254

QUESTIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 64254
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

Facility and Ground Water	
<i>Please answer as many of these questions as possible in this group. More information will help us identify the appropriate associations in the system.</i>	
Facility or Site Name	San Juan 28-7 Unit 194 BGT 2
Facility ID (#), if known	Not answered.
Facility Type	Below Grade Tank - (BGT)
Well Name, include well number	San Juan 28-7 Unit 194 BGT 2
Well API, if associated with a well	30-039-20630
Pit / Tank Type	Not answered.
Pit / Tank Name or Identifier	Not answered.
Pit / Tank Opened Date, if known	Not answered.
Pit / Tank Dimensions, Length (ft)	Not answered.
Pit / Tank Dimensions, Width or Diameter (ft)	Not answered.
Pit / Tank Dimensions, Depth (ft)	Not answered.
Ground Water Depth (ft)	Not answered.
Ground Water Impact	Not answered.
Ground Water Quality (TDS)	Not answered.

Below-Grade Tank	
<i>Subsection I of 19.15.17.11 NMAC</i>	
Volume / Capacity (bbls)	Not answered.
Type of Fluid	Not answered.
Pit / Tank Construction Material	Not answered.
Secondary containment with leak detection	Not answered.
Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	Not answered.
Visible sidewalls and liner	Not answered.
Visible sidewalls only	Not answered.
Tank installed prior to June 18, 2008	Not answered.
Other, Visible Notation. Please specify	Not answered.
Liner Thickness (mil)	Not answered.
HDPE (Liner Type)	Not answered.
PVC (Liner Type)	Not answered.
Other, Liner Type. Please specify (Variance Required)	Not answered.

Fencing	
<i>Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)</i>	
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)	Not answered.
Four foot height, four strands of barbed wire evenly spaced between one and four feet	Not answered.
Alternate, Fencing. Please specify (Variance Required)	Not answered.

Netting	
<i>Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)</i>	
Screen	Not answered.
Netting	Not answered.
Other, Netting. Please specify (Variance May Be Needed)	Not answered.

Signs	
<i>Subsection C of 19.15.17.11 NMAC (If there are multiple operators at a site, each operator must have their own sign in compliance with Subsection C of 19.15.17.11 NMAC.)</i>	

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	Not answered.
Signed in compliance with 19.15.16.8 NMAC	Not answered.

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.	Not answered.
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval	Not answered.

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.

Siting Criteria, General Siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank	Not answered.
NM Office of the State Engineer - iWATERS database search	Not answered.
USGS	Not answered.
Data obtained from nearby wells	Not answered.

Siting Criteria, Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lakebed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark)	Not answered.
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption	Not answered.

Proposed Closure Method

Below-grade Tank	Below Grade Tank - (BGT)
Waste Excavation and Removal	Not answered.
Alternate Closure Method. Please specify (Variance Required)	Not answered.

Operator Application Certification

Registered / Signature Date	Not answered.
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ACKNOWLEDGMENTS

Action 64254

ACKNOWLEDGMENTS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 64254
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I have received prior approval from the OCD to submit documentation of a legacy below-grade tank on behalf of my operator.
<input checked="" type="checkbox"/>	I hereby certify that the information submitted with this documentation is true, accurate and complete to the best of my knowledge and belief.

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CONDITIONS

Action 64254

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 64254
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	12/1/2021