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 EAST

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 247 East BGT

API Number: 30-039-21650 OCD Permit Number:

U/L or Qtr/Qtr N Section 11 Township 28N Range 7W County: Rio Arriba

Center of Proposed Design: Latitude 36.67093 Longitude -107.54503 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:** December 13, 2021

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

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: 12/30/2013**

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: 12/10/21

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 247 East BGT
API No.: 30-039-21650

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 2013 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 2013 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).

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: Whitehead, Christopher , EMNRD <Chris.Whitehead@state.nm.us>
Sent: Friday, December 10, 2021 10:26 AM
To: Kandis Roland
Cc: Mandi Walker
Subject: RE: [EXTERNAL] FW: SAN JUAN 28-7 UNIT 247 - INC

Yes, for this circumstance, that is accepted.

Christopher Whitehead ● Environmental Specialist
Environmental Bureau ● EMNRD - OCD

From: Kandis Roland <kroland@hilcorp.com>
Sent: Friday, December 10, 2021 9:14 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 247 - INC

Chris,

I am working on this Historical BGT to clean up the paperwork. This location had 2 BGTs that were closed in 2013. Both BGTs were never permitted and closure reports were never submitted to OCD. Attached is the sample report that was taken in 2013 for both BGTs.

I just want to confirm that I am good to file 2 (one for each tank) C-144LB Closure Plan Onlys followed by 2 C-144LB Closure Permits in order to clean-up the historical records.

Thanks,

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

From: Clara Cardoza <ccardoza@hilcorp.com>
Sent: Thursday, November 5, 2020 10:48 AM
To: Kandis Roland <kroland@hilcorp.com>; Trey Sullivan <tsullivan@hilcorp.com>; Ryan Frost <rfrost@hilcorp.com>
Cc: Cheryl Weston <cweston@hilcorp.com>
Subject: RE: SAN JUAN 28-7 UNIT 247 - INC

This closure report has two BGTs in it. See page 7 for the locations.

From: Kandis Roland
Sent: Thursday, November 5, 2020 9:44 AM
To: Trey Sullivan <tsullivan@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>; Ryan Frost <rfrost@hilcorp.com>; Mark McKnight <mmcknight@hilcorp.com>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: SAN JUAN 28-7 UNIT 247 - INC

Today's Date:	11/5/2020				
Well Name:	SAN JUAN 28-7 UNIT 247	**Location:**	Sec: 11	Twn: 028N	Rng: 0
API Number:	30.039.21650	**Footage:**	825' FSL & 1970' FWL		
Operator:	Hilcorp Energy Company	**Area/Run/MSO:**	10	1006	Cliff H
Meter #:	90-410-01	**Pipeline:**	ENT		
INC Number:	Verbal.JK.1152020	**Agency:**	OCD	**Inspector:**	Jonatha
Type of INC:	Verbal	**Photos Required:**	**Yes**	**Due Date:**	
Issue of Concern:	Review of prior inspections and historic aerials found that location had 2 BGTs that were closed betwee no C-144 BGT Permits/Registrations in well file and no BGT C-144 Closures found in well file.				

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

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 36.67093 Longitude -107.54503
(NAD 83 in decimal degrees to 5 decimal places)

Site Name San Juan 28-7 Unit 247 East BGT	Site Type Gas Well
Date Release Discovered **N/A**	API# *(if applicable)* *30-039-21650*

Unit Letter	Section	Township	Range	County
N	11	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: 12/10/2021

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

December 30, 2013

Lindsay Dumas
ConocoPhillips
San Juan Business Unit
Office 214-07
5525 Hwy 64
Farmington, New Mexico 87401

Via electronic mail to: SJBUE-Team@ConocoPhillips.com

RE: Below Grade Tank Closure Report
San Juan 28-7 #247
Rio Arriba County, New Mexico

Dear Ms. Dumas:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with two below grade tank (BGT) closures at ConocoPhillips (CoP) San Juan 28-7 #247, 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 #247
Legal Description – SE¼ SW¼, Section 11, T28N, R7W, Rio Arriba County, New Mexico
Well Latitude/Longitude – N36.67077 and W107.54521, respectively
West BGT Latitude/Longitude – N36.67111 and W107.54539, respectively
East BGT Latitude/Longitude – N36.67093 and W107.54503, respectively
Land Jurisdiction – Bureau of Land Management (BLM)
Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, November 2013

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 20 based on the following factors:

- **Depth to Groundwater:** A cathodic report dated March 2007 for the San Juan 28-7 #233F, located 1,940 feet southwest and 35 feet lower in elevation, reported the depth to groundwater at 100 feet below ground surface (bgs). (0 points)
- **Wellhead Protection Area:** The tank locations are not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** An unnamed wash which discharges to the wash in Delgadita Canyon is located approximately 125 feet west-northwest of the West BGT. (20 points)

1.3 BGT Closure Assessment

AES was contacted by Steve Welch, CoP representative, on November 15 and November 18, 2013. On November 15, 2013, Stephanie Lynn and David Reese of AES mobilized to the location to complete sampling below the West BGT. On November 19, 2013, Deborah Watson and Jesse Christopherson mobilized to the location to complete sampling below the East BGT. AES personnel collected six soil samples from below each BGT liner. For each BGT, 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 November 15 and November 19, 2013, AES personnel conducted field screening and collected ten soil samples (S-1 through S-10) and two 5-point composite (SC-1 and SC-2) from below the BGTs. Soil samples were collected from approximately 0.5 feet below the former BGTs for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil samples SC-1 and SC-2 were field screened for VOCs and chloride and were also 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 samples SC-1 and SC-2 were 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 samples (SC-1 and SC-2) collected for laboratory analysis were placed into new, clean, laboratory-supplied containers, which were then labeled, placed on ice, and each logged onto separate sample chain of custody records. Each sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 and SC-2 were laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

West BGT field screening readings for VOCs via OVM were each measured at 0.0 ppm. Field TPH concentrations ranged from 33.0 mg/kg in S-2 up to 50.5 mg/kg in S-4. The field chloride concentration in SC-1 was 40 mg/kg.

East BGT field screening readings for VOCs via OVM ranged from 0.0 ppm in S-9 up to 2.8 ppm in S-8. Field TPH concentrations ranged from 35.3 mg/kg in S-7 up to 63.6 mg/kg in S-6. The field chloride concentration in SC-2 was 40 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Reports are attached.

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results
San Juan 28-7 #247 BGT Closure, November 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	11/15/13	0.5	0.0	46.5	NA
S-2	11/15/13	0.5	0.0	33.0	NA

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-3	11/15/13	0.5	0.0	41.1	NA
S-4	11/15/13	0.5	0.0	50.5	NA
S-5	11/15/13	0.5	0.0	43.8	NA
SC-1	11/15/13	0.5	0.0	NA	40
S-6	11/19/13	0.5	0.4	63.6	NA
S-7	11/19/13	0.5	0.6	35.3	NA
S-8	11/19/13	0.5	2.8	42.0	NA
S-9	11/19/13	0.5	0.0	56.9	NA
S-10	11/19/13	0.5	1.0	43.4	NA
SC-2	11/19/13	0.5	0.6	NA	40

NA - Not Analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.038 mg/kg and 0.19 mg/kg, respectively. The laboratory chloride concentration in SC-1 was reported at 43 mg/kg. For SC-2, laboratory analytical results reported benzene and total BTEX concentrations as less than 0.032 mg/kg and 0.159 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg in SC-2. 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 #247 BGT Closure, November 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	11/15/13	0.5	<0.038	<0.190	NA	NA	43
SC-2	11/19/13	0.5	<0.032	<0.159	NA	NA	<30

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 were below the NMOCD action level of 100 mg/kg for each BGT. The highest TPH concentration from the West BGT was reported in S-2 with 50.5 mg/kg, and the highest TPH concentration from the East BGT was reported in S-6 with 63.6 mg/kg. Benzene and total BTEX concentrations in SC-1 and SC-2 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 and SC-2 were also 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 San Juan 28-7 #247.

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

Sincerely,

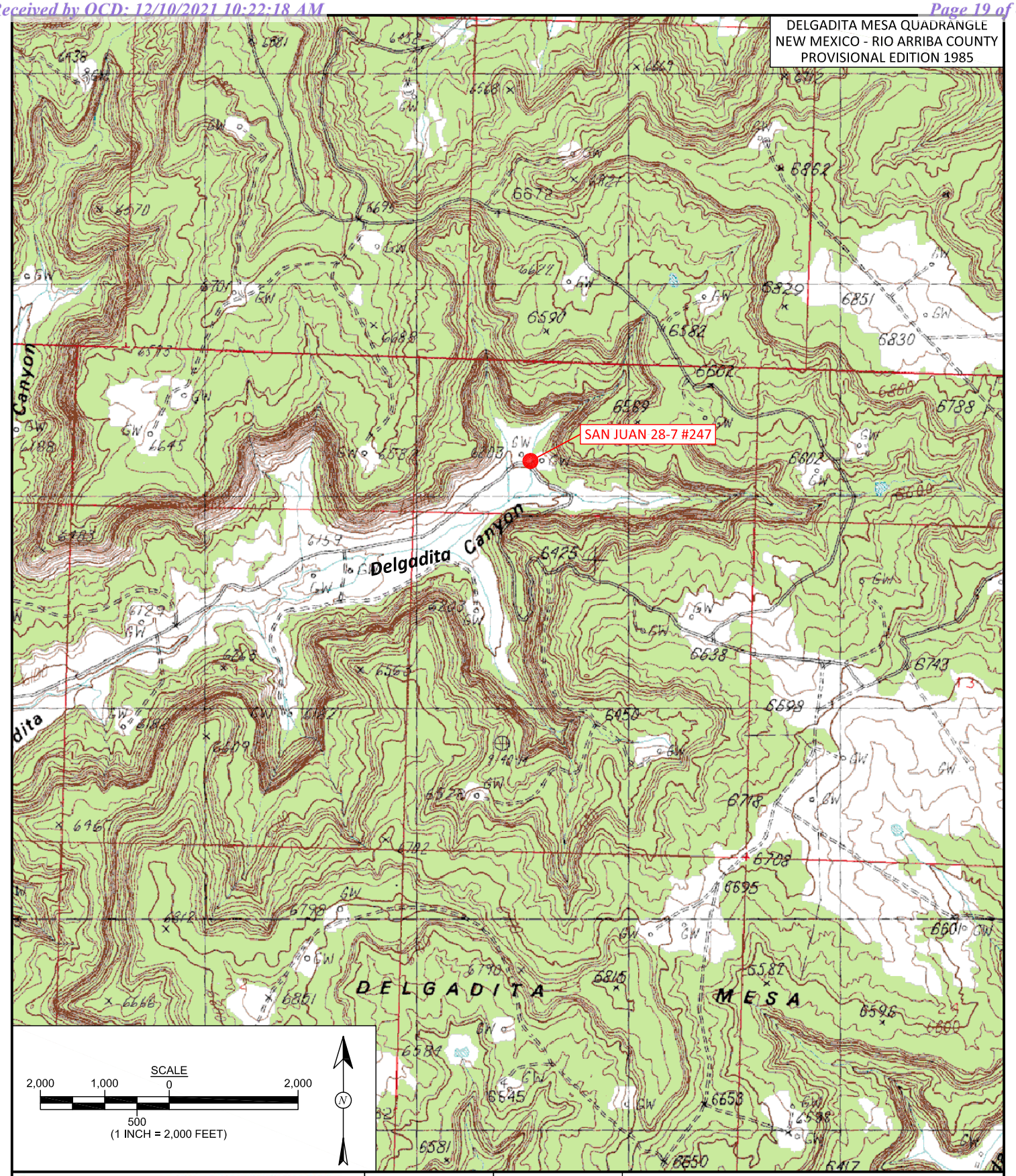
David J. Reese
Environmental Scientist

Elizabeth McNally, P.E.

Attachments:

- Figure 1. Topographic Site Location Map
- Figure 2. Aerial Site Map, November 2013
- AES Field Screening Report 111513
- AES Field Screening Report 111913
- Hall Analytical Report 1311703
- Hall Analytical Report 1311862

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\SJ 28-7 #247\San Juan 28-7 #247 BGT Closure Report 123013.docx

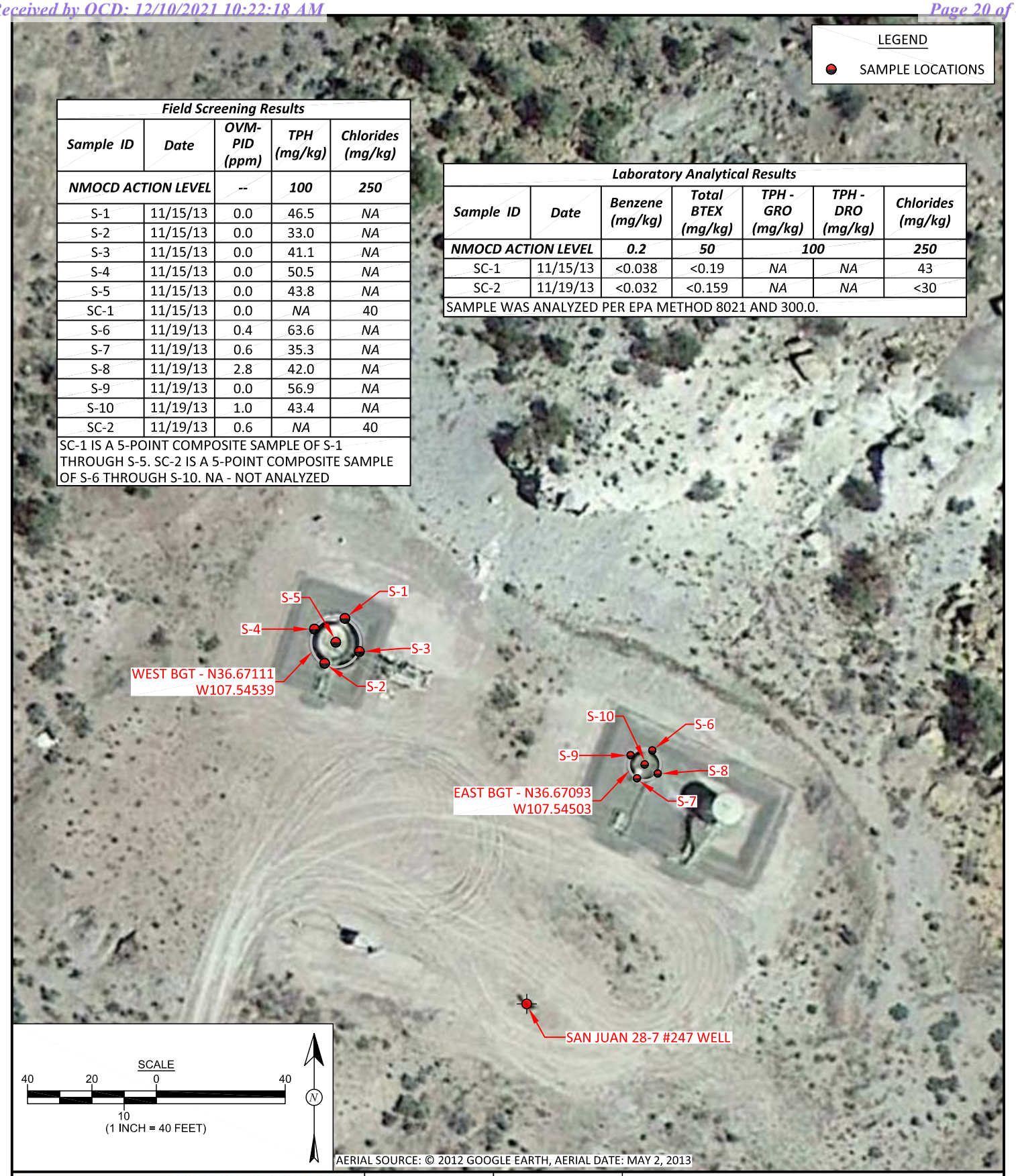


Animas Environmental Services, LLC

DRAWN BY: S. Glasses	**DATE DRAWN:** November 18, 2013
REVISIONS BY: C. Lameman	**DATE REVISED:** December 10, 2013
CHECKED BY: D. Watson	**DATE CHECKED:** December 10, 2013
APPROVED BY: E. McNally	**DATE APPROVED:** December 10, 2013

FIGURE 1

TOPOGRAPHIC SITE LOCATION MAP
ConocoPhillips
SAN JUAN 28-7 #247
SE¼ SW¼, SECTION 11, T28N, R7W
RIO ARRIBA COUNTY, NEW MEXICO
N36.67077, W107.54521



Field Screening Results

Sample ID	Date	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		--	100	250
S-1	11/15/13	0.0	46.5	NA
S-2	11/15/13	0.0	33.0	NA
S-3	11/15/13	0.0	41.1	NA
S-4	11/15/13	0.0	50.5	NA
S-5	11/15/13	0.0	43.8	NA
SC-1	11/15/13	0.0	NA	40
S-6	11/19/13	0.4	63.6	NA
S-7	11/19/13	0.6	35.3	NA
S-8	11/19/13	2.8	42.0	NA
S-9	11/19/13	0.0	56.9	NA
S-10	11/19/13	1.0	43.4	NA
SC-2	11/19/13	0.6	NA	40

SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5. SC-2 IS A 5-POINT COMPOSITE SAMPLE OF S-6 THROUGH S-10. 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	11/15/13	<0.038	<0.19	NA	NA	43
SC-2	11/19/13	<0.032	<0.159	NA	NA	<30

SAMPLE WAS ANALYZED PER EPA METHOD 8021 AND 300.0.

Animas Environmental Services, LLC

DRAWN BY: S. Glasses	DATE DRAWN: November 18, 2013
REVISIONS BY: C. Lameman	DATE REVISED: December 10, 2013
CHECKED BY: D. Watson	DATE CHECKED: December 10, 2013
APPROVED BY: E. McNally	DATE APPROVED: December 10, 2013

FIGURE 2

AERIAL SITE MAP
BELOW GRADE TANK CLOSURE
NOVEMBER 2013
ConocoPhillips
SAN JUAN 28-7 #247
SE¼ SW¼, SECTION 11, T28N, R7W
RIO ARRIBA COUNTY, NEW MEXICO
N36.67077, W107.54521

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 #247 (West BGT)

Date: 11/15/2013

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	11/15/2013	12:35	North	0.0	NA	13:29	46.5	20.0	1	SL
S-2	11/15/2013	12:36	South	0.0	NA	13:33	33.0	20.0	1	SL
S-3	11/15/2013	12:37	East	0.0	NA	13:36	41.1	20.0	1	SL
S-4	11/15/2013	12:39	West	0.0	NA	13:40	50.5	20.0	1	SL
S-5	11/15/2013	12:41	Center	0.0	NA	13:43	43.8	20.0	1	SL
SC-1	11/15/2013	12:53	Composite	0.0	40	*Not Analyzed for TPH.*				

DF Dilution Factor
NA Not Analyzed
ND Not Detected at the Reporting Limit
PQL Practical Quantitation Limit
**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: Stephanie Alyn

Report Finalized: 11/15/13

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 #247 (East BGT)

Date: 11/19/2013

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-6	11/19/2013	14:45	North	0.4	NA	15:22	63.6	20.0	1	DAW
S-7	11/19/2013	14:48	South	0.6	NA	15:25	35.3	20.0	1	DAW
S-8	11/19/2013	14:51	East	2.8	NA	15:27	42.0	20.0	1	DAW
S-9	11/19/2013	14:53	West	0.0	NA	15:29	56.9	20.0	1	DAW
S-10	11/19/2013	14:55	Center	1.0	NA	15:31	43.4	20.0	1	DAW
SC-2	11/19/2013	15:00	Composite	0.6	40	*Not Analyzed for TPH.*				

DF Dilution Factor
NA Not Analyzed
ND Not Detected at the Reporting Limit
PQL Practical Quantitation Limit
**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: Deborah Watson

Report Finalized: 11/19/13

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

November 20, 2013

Debbie Watson

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

RE: CoP SJ 28-7 #247 OrderNo.: 1311703

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 11/18/2013 for the analyses presented in the following report.

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

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

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1311703**
Date Reported: **11/20/2013**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental
Client Sample ID: SC-1
Project: CoP SJ 28-7 #247
Collection Date: 11/15/2013 12:53:00 PM
Lab ID: 1311703-001 **Matrix:** SOIL **Received Date:** 11/18/2013 10:10:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**	
Benzene	ND	0.038		mg/Kg	1	11/18/2013 11:25:56 AM	R14860
Toluene	ND	0.038		mg/Kg	1	11/18/2013 11:25:56 AM	R14860
Ethylbenzene	ND	0.038		mg/Kg	1	11/18/2013 11:25:56 AM	R14860
Xylenes, Total	ND	0.076		mg/Kg	1	11/18/2013 11:25:56 AM	R14860
Surr: 4-Bromofluorobenzene	110	80-120		%REC	1	11/18/2013 11:25:56 AM	R14860
EPA METHOD 300.0: ANIONS						Analyst: **JRR**	
Chloride	43	30		mg/Kg	20	11/18/2013 1:00:16 PM	10384

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

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
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#: **1311703**

20-Nov-13

Client: Animas Environmental

Project: CoP SJ 28-7 #247

Sample ID	**MB-10384**	SampType:	**MBLK**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**PBS**	Batch ID:	**10384**	RunNo:	**14888**					
Prep Date:	**11/18/2013**	Analysis Date:	**11/18/2013**	SeqNo:	**429443**	Units:	**mg/Kg**			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-10384**	SampType:	**LCS**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**LCSS**	Batch ID:	**10384**	RunNo:	**14888**					
Prep Date:	**11/18/2013**	Analysis Date:	**11/18/2013**	SeqNo:	**429444**	Units:	**mg/Kg**			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.6	90	110			

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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
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#: **1311703**

20-Nov-13

Client: Animas Environmental

Project: CoP SJ 28-7 #247

Sample ID	**MB-10364 MK**	SampType:	**MBLK**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**PBS**	Batch ID:	**R14860**	RunNo:	**14860**					
Prep Date:		Analysis Date:	**11/18/2013**	SeqNo:	**428880**	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		110	80	120			

Sample ID	**LCS-10364 MK**	SampType:	**LCS**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**LCSS**	Batch ID:	**R14860**	RunNo:	**14860**					
Prep Date:		Analysis Date:	**11/18/2013**	SeqNo:	**428881**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.99	0.050	1.000	0	99.3	80	120			
Toluene	1.0	0.050	1.000	0	101	80	120			
Ethylbenzene	1.0	0.050	1.000	0	101	80	120			
Xylenes, Total	3.1	0.10	3.000	0	103	80	120			
Surr: 4-Bromofluorobenzene	1.2		1.000		117	80	120			

Sample ID	**MB-10364**	SampType:	**MBLK**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**PBS**	Batch ID:	**10364**	RunNo:	**14860**					
Prep Date:	**11/15/2013**	Analysis Date:	**11/18/2013**	SeqNo:	**428883**	Units:	**%REC**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

Sample ID	**LCS-10364**	SampType:	**LCS**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**LCSS**	Batch ID:	**10364**	RunNo:	**14860**					
Prep Date:	**11/15/2013**	Analysis Date:	**11/18/2013**	SeqNo:	**428884**	Units:	**%REC**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.2		1.000		117	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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

Sample Log-In Check List

Client Name: Animas Environmental Work Order Number: 1311703 RcptNo: 1

Received by/date: AT 11/18/13

Logged By: **Anne Thorne** 11/18/2013 10:10:00 AM Anne Thorne

Completed By: **Anne Thorne** 11/18/2013 Anne Thorne

Reviewed By: AT 11/18/13

Chain of Custody

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

Log In

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

16. 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: _____

17. Additional remarks:

18. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Chain-of-Custody Record

Client: Animas Environmental Services

Mailing Address: 624 E Comanche
Farmington, NM 87401

Phone #: 505-564-2281

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: Cop SJ 28-7 #247

Project #:

Project Manager: D. Watson

Sampler: D. Reese

On Ice: ☒ Yes ☐ No

Sample Temperature: 1.0

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. 131703	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)					Air Bubbles (Y or N)
11/15/13	12:53	soil	SC-1	MeOH kit 1-4 oz	MeOH non	-01	X							X								

Date:	Time:	Relinquished by:	Received by:	Date	Time
11/18/13	1615	Dustin Reese			
11/18/13	1636			11/18/13	1010

Remarks: Bill to ConocoPhillips
Area: 23
W.O. 1023506TC
Activity Code: T110
Supervisor: Carlos Rey
User ID: Bemle
Ordered by: Steve Welch

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.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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Website: www.hallenvironmental.com

November 22, 2013

Debbie Watson

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

RE: COP San Juan 28-7 #247 OrderNo.: 1311862

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 11/20/2013 for the analyses presented in the following report.

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

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

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1311862**
Date Reported: **11/22/2013**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental **Client Sample ID:** SC-2
Project: COP San Juan 28-7 #247 **Collection Date:** 11/19/2013 3:00:00 PM
Lab ID: 1311862-001 **Matrix:** MEOH (SOIL) **Received Date:** 11/20/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8021B: VOLATILES						Analyst: **RAA**	
Benzene	ND	0.032		mg/Kg	1	11/20/2013 12:22:58 PM	R14930
Toluene	ND	0.032		mg/Kg	1	11/20/2013 12:22:58 PM	R14930
Ethylbenzene	ND	0.032		mg/Kg	1	11/20/2013 12:22:58 PM	R14930
Xylenes, Total	ND	0.063		mg/Kg	1	11/20/2013 12:22:58 PM	R14930
Surr: 4-Bromofluorobenzene	105	80-120		%REC	1	11/20/2013 12:22:58 PM	R14930
EPA METHOD 300.0: ANIONS						Analyst: **JRR**	
Chloride	ND	30		mg/Kg	20	11/20/2013 1:07:00 PM	10439

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

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
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#: **1311862**

22-Nov-13

Client: Animas Environmental

Project: COP San Juan 28-7 #247

Sample ID	**MB-10439**	SampType:	**MBLK**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**PBS**	Batch ID:	**10439**	RunNo:	**14965**					
Prep Date:	**11/20/2013**	Analysis Date:	**11/20/2013**	SeqNo:	**431837**	Units:	**mg/Kg**			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-10439**	SampType:	**LCS**	TestCode:	**EPA Method 300.0: Anions**					
Client ID:	**LCSS**	Batch ID:	**10439**	RunNo:	**14965**					
Prep Date:	**11/20/2013**	Analysis Date:	**11/20/2013**	SeqNo:	**431838**	Units:	**mg/Kg**			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	91.5	90	110			

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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
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#: **1311862**

22-Nov-13

Client: Animas Environmental

Project: COP San Juan 28-7 #247

Sample ID	**1311862-001A MS**	SampType:	**MS**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**SC-2**	Batch ID:	**R14930**	RunNo:	**14930**					
Prep Date:		Analysis Date:	**11/20/2013**	SeqNo:	**431434**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.62	0.032	0.6305	0	98.9	67.3	145			
Toluene	0.64	0.032	0.6305	0.004722	101	66.8	144			
Ethylbenzene	0.65	0.032	0.6305	0	103	61.9	153			
Xylenes, Total	2.0	0.063	1.892	0	105	65.8	149			
Surr: 4-Bromofluorobenzene	0.71		0.6305		113	80	120			

Sample ID	**1311862-001A MSD**	SampType:	**MSD**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**SC-2**	Batch ID:	**R14930**	RunNo:	**14930**					
Prep Date:		Analysis Date:	**11/20/2013**	SeqNo:	**431435**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.62	0.032	0.6305	0	98.9	67.3	145	0.0354	20	
Toluene	0.65	0.032	0.6305	0.004722	102	66.8	144	0.218	20	
Ethylbenzene	0.65	0.032	0.6305	0	103	61.9	153	0.563	20	
Xylenes, Total	2.0	0.063	1.892	0	104	65.8	149	0.491	20	
Surr: 4-Bromofluorobenzene	0.71		0.6305		112	80	120	0	0	

Sample ID	**mb-10424 7**	SampType:	**MBLK**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**PBS**	Batch ID:	**R14930**	RunNo:	**14930**					
Prep Date:		Analysis Date:	**11/20/2013**	SeqNo:	**431442**	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	1.0		1.000		99.9	80	120			

Sample ID	**lcs-10424 6**	SampType:	**LCS**	TestCode:	**EPA Method 8021B: Volatiles**					
Client ID:	**LCSS**	Batch ID:	**R14930**	RunNo:	**14930**					
Prep Date:		Analysis Date:	**11/20/2013**	SeqNo:	**431450**	Units:	**mg/Kg**			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.0	0.050	1.000	0	104	80	120			
Toluene	1.1	0.050	1.000	0	107	80	120			
Ethylbenzene	1.1	0.050	1.000	0	107	80	120			
Xylenes, Total	3.2	0.10	3.000	0	107	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		111	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
O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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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: 1311862 RcptNo: 1

Received by/date: MG 11/20/13

Logged By: **Lindsay Mangin** 11/20/2013 10:00:00 AM

Completed By: **Lindsay Mangin** 11/20/2013 10:23:27 AM

Reviewed By: MG 11/20/13

Chain of Custody

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

Log In

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

16. 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: _____

17. Additional remarks:

18. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Chain-of-Custody Record

Client: Animas Environmental Services LLC

Mailing Address: 624 E. Comanche Farmington NM 87401

Phone #: 505 564 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: CoP San Juan 28-7 #247

Project #:

Project Manager: D. Watson

Sampler: D Watson

On Ice: ☒ Yes ☐ No

Sample Temperature: 1.0

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. 1311862	BTEX + [illegible] + [illegible]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)	300.0 chlorides				Air Bubbles (Y or N)
11-19-13	1500	Soil	SC-2	MeOH kit 4 oz	MeOH —	-001	X											X				

Date:	Time:	Relinquished by:	Received by:	Date	Time
11/19/13	1735	Debra Watson	Christine Walter	11/19/13	1735
11/19/13	1754	Christine Walter	[signature]	11/20/13	10:00

Remarks: Bill to ConocoPhillips
WO: 10350612
Area: 23
act. code: T110
Supervisor: Carlos Rey
User: Benale
ordered by: Steve Welch

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.

San Juan 28-7 Unit 247 East BGT

Record Clean Up: Historic BGT Closure

BGT was closed out in 2013 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 66266

QUESTIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 66266
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

Facility and Ground Water *Please answer as many of these questions as possible in this group. More information will help us identify the appropriate associations in the system.*	
Facility or Site Name	San Juand 28-7 Unit 247 East BGT
Facility ID (f#), if known	*Not answered.*
Facility Type	Below Grade Tank - (BGT)
Well Name, include well number	San Juan 28-7 Unti 247
Well API, if associated with a well	3003921650
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 *Subsection I of 19.15.17.11 NMAC*	
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.*

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District IV
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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 (continued)

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 66266
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

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

Signs	
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.)	
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 ofequivalency 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.*

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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 (continued)

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 66266
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

QUESTIONS

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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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

ACKNOWLEDGMENTS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 66266
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

ACKNOWLEDGMENTS

☑	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.
☑	I hereby certify that the information submitted with this documentation is true, accurate and complete to the best of my knowledge and belief.

District I
1625 N. French Dr., Hobbs, NM 88240
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CONDITIONS

Action 66266

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 66266
	Action Type: [C-144] Legacy Below Grade Tank Plan (C-144LB)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	Due to no TPH data submitted as part of this historical closure, closure conditionally approved dependent on submission of TPH results collected from 1' below the historical BGT depth from level surface	12/13/2021