

Stantec Consulting Services Inc. 11153 Aurora Avenue Des Moines, Iowa 50322 Phone: (515) 253-0830 Fax: (515) 253-9592

December 12, 2017 File: 193710222.100.004

Mr. Randy Bayliss New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Well Closure Activities Lindrith B#24 Site NMOCD Case No. 3RP-214-0 T24N, R03W, Sec 9, Unit N

Dear Mr. Bayliss:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services Inc. (Stantec) has prepared this letter to document well closure and site restoration activities completed at the above-referenced site (Site). The well closure activities were completed in response to the No Further Action (NFA) determination granted by the New Mexico Oil Conservation Division (NMOCD) in a letter dated November 7, 2017 (Attachment A).

Stantec marked the wells to be abandoned during a Site visit completed on June 7, 2017. Utility locate notifications were completed through New Mexico 811 prior to beginning the well abandonment activities.

On November 15, 2017, Cascade Drilling (Cascade) completed plugging and abandonment activities for one (1) 4-inch-diameter well (MW-1R) and six (6) 2-inch diameter wells (MW-2, MW-3, MW-4, MW-5, MW-6, and MW-7). Cascade abandoned the wells in accordance with the rules of the Office of the New Mexico State Engineer (NMOSE). No representatives of the NMOCD, NMOSE, or other visitors were on-site during the well plugging and abandonment activities.

Well plugging and abandonment activities consisted of plugging each well with bentonite-based grout to within three feet of the surface, and cutting the well casing off at 3 feet below ground surface. The remainder of the below and above ground well casing and the above-grade protective casings for the wells were removed from the Site for either recycling or disposal as construction debris. The ground surface was graded in order to be compatible with the surrounding ground surface. No fill soils were brought on-site for use in Site restoration. Photographic documentation of final site conditions is included as Attachment B.

An updated Site Plan Map is included as Figure 1. Copies of the Plugging Records, submitted to the NMOSE on December 5, 2017, are included as Attachment C.



December 12, 2017 Mr. Randy Bayliss Page 2 of 2

Reference: Well Closure Activities

Please contact Mr. Joseph Wiley at (713) 420-3475, or me, if you have any questions or require additional information.

Sincerely,

Stantec Consulting Services Inc.

Stephen R. Varsa Supervising Hydrogeologist Phone: (515) 251-1020 Fax: (515) 253-9592 steve.varsa@stantec.com

/srv:csh:leh

Attachments: Figure – Site Plan Map

A – NMOCD NFA Letter

B – Photographic Log

C – NMOSE Plugging Records

cc: Joseph Wiley, EPCGP Cory Smith, Vanessa Fields, NMOCD District 3

FIGURE











ATTACHMENT A



David R. Catanach, Division Director

Oil Conservation Division

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary

07 November 2017

Joseph Wiley, P.G. Project Manager Pipeline Remediation Kinder Morgan, Inc 1001 Louisiana Street, Room 956I Houston, TX 77002

Subject:1) No Further Action 3RP-214 Lindrith B#24 and
2) Additional Monitoring 3RP-186 Hammond #41A

Ref: 1) KM Groundwater Monitoring Report and Request for Site Closure of August 10, 2017 for 3RP-214
2) KM Groundwater Monitoring Report and Request for Site Closure of September 1, 2017 for 3RP-186

Dear Mr. Wiley:

OCD has reviewed Kinder Morgan (KM) monitoring latest results and requests for closure referenced above.

For 3RP-214 Lindrith B#24, the available information indicates KM has met the requirements of 19.15.29-30 NMAC. No further corrective action is required. This remediation project is closed. This finding by the OCD does not relieve KM of responsibility if future information shows a threat to ground water, surface water, human health, or the environment. Further, it does not relieve KM of responsibility for compliance with any federal, state, or local law. Please plug remaining monitoring wells per requirements of the New Mexico Office of the State Engineer.

For 3RP-186 Hammond #41A, historic results (2003-2011) show moderate to low BTEX contamination at MW-4 which was not delineated to the NW. OCD understands your rationale about plumes shrinking back to the original source area. Nevertheless. given the sensitivity, shallow depth to water and the downstream location of MW-4, OCD requires confirmation of the absence of BTEX to the NW of MW-4. A one-time groundwater sample from a temporary well tested by Methods 8260 and 8015 would suffice. Please notify Santa Fe and District III at least 72 hours but not more than 1 week prior to both the construction of the temporary well and collection of the water sample.

Randolph Bayliss, P.E. Hydrologist, District III

Cory Smith Environmental Specialist, District III

Vanessa Fields Environmental Specialist, District III

Cc: Jim Griswold, Charlie Perrin, Brandon Powell, Cory Smith, Vanessa Fields, Steve Varsa



ATTACHMENT B





Photographic Log

Client:	El Paso CGP Company, LLC	Project:	193710222
Site Name:	Lindrith B#24	Site Location:	Rio Arriba County, New Mexico
Photograph ID: 1	and the second		
Photo Location: Lindrith B#24 site			
Direction: East	and the second		
Survey Date: 11/15/2017			
Comments: Overview of site and existing wells upon arr	ival.		
Photograph ID: 2			
Photo Location: Lindrith B#24 site			
Direction: East/Northeast			
Survey Date: 11/15/2017			
Comments: Post-abandonment wo Cascade Drilling near t former MW-1R location	the		



Photographic Log

Client:	El Paso CGP Company, LLC	Project:	193710222
Site Name:	Lindrith B#24	Site Location:	Rio Arriba County, New Mexico
Photograph ID: 3			
Photo Location: Lindrith B#24 site	100	La Carton	Start Start
Direction: South		- ALAMANDA A	Sanser'
Survey Date: 11/15/2017			
Comments: Final conditions at the former MW-4 location			
Photograph ID: 4			
Photo Location: Lindrith B#24 site			
Direction: East			
Survey Date: 11/15/2017			
Comments: Overview of final site conditions near the fo MW-6, MW-3, and MV locations.			



Photographic Log

Client:	El Paso CGP Company, LLC	Project:	193710222
Site Name:	Lindrith B#24	Site Location:	Rio Arriba County, New Mexico
Photograph ID: 5			
Photo Location: Lindrith B#24 site	CONTRACTOR OF		
Direction: Down			
Survey Date: 11/15/2017			
Comments: Materials removed for recycling. Remaining concrete and other we debris was also remo from the site for dispo	ell ved		
Photograph ID: 6			
Photo Location: Lindrith B#24 site			
Direction: Northeast			
Survey Date: 11/15/2017			in the
Comments: Overview of final site conditions near the fo MW-1R, MW-4, and N locations.			

ATTACHMENT C







I. GEN	ERAL / WELL OWNERSHIP:
State En	gineer Well Number:
Well ow	ner: El Paso CGP Company, LLC Phone No.: 713-420-3475
Mailing	address: 1001 Louisiana St, Room 9561
City: He	ouston State: TX Zip code: 77002
<u>II. WEI</u>	LL PLUGGING INFORMATION:
1)	Name of well drilling company that plugged well: Cascade Drilling LP
2)	New Mexico Well Driller License No.: WD-1210 Expiration Date: 10/31/2019
3)	Well plugging activities were supervised by the following well driller(s)/rig supervisor(s): <u>Arnold Lamon</u>
4)	Date well plugging began_11/15/17 Date well plugging concluded:11/15/17
5)	GPS Well Location:36.319870 -107.166196
6)	Depth of well confirmed at initiation of plugging as: <u>32.5</u> ft below ground level (bgl), by the following manner: <u>Tag line</u>
7)	Static water level measured at initiation of plugging:Dry [t bgl
8)	Date well plugging plan of operations was approved by the State Engineer:11/9/17
9)	Were all plugging activities consistent with an approved plugging plan? <u>Yes</u> If not, please describe differences between the approved plugging plan and the well as it was plugged (attach additional pages as needed):
<u> </u>	WELL

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume of <u>Material Placed</u> (gallons)	Theoretical Volume of Borehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
_	0,	25 gallons	21.2	Tremie	
_					
-				6) ()	7
-					
-	Portland type 2 cement 5% bentonite				
_	bentoune				
-					
_				2	
_					
-					
-			1		
-					
-	35.6				
_					
-					
_		MULTIPLY	BY AND OBTAIN		
		cubic feet x 7	4805 = gallons		
III. SIGN	ATURE:	cubic yards x 201.	97 = gallons		

For each interval plugged, describe within the following columns:

III. SIGNATURE:

I, <u>Arnold Lamon</u>, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

× cm

Signature of Well Driller

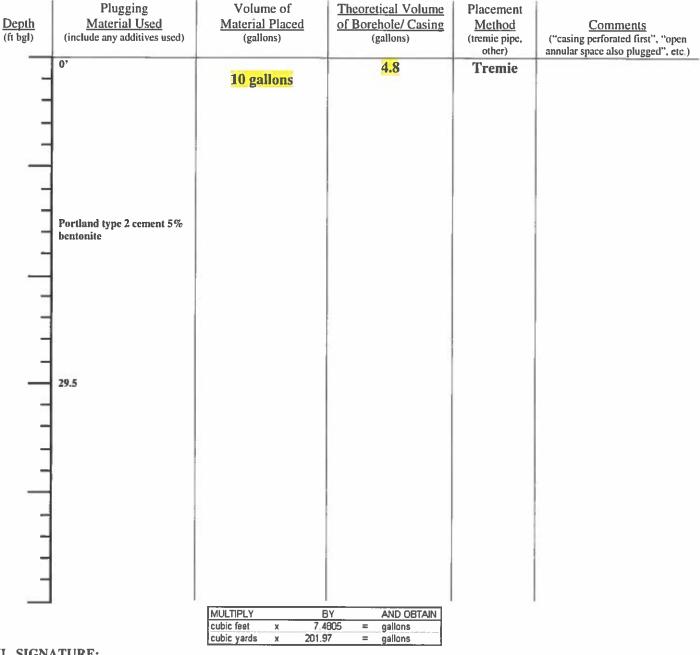
11/27/17

Date





	ENERAL / WELL OWNERS		
State	Engineer Well Number:	<u>SJ-4105 POD2 (Mw-2)</u>	
Well	owner: El Paso CGP Compa	my, LLC	Phone No.: 713-420-3475
Maili	ng address: <u>1001 Louisiana S</u>	t, Room 9561	
City:	Houston	State: _ TX	Zip code: <u>77002</u>
<u>II. W</u>	ELL PLUGGING INFORM	IATION:	
1)	Name of well drilling com	pany that plugged well:Casca	de Drilling LP
2)	New Mexico Well Driller I	License No.: WD-1210	Expiration Date: 10/31/2019
3)	Well plugging activities we	ere supervised by the following well driller	r(s)/rig supervisor(s): <u>Arnold Lamon</u>
4)	Date well plugging began_	11/15/17 Date well plugging concluded	:
5)	GPS Well Location:36.319	645 -107.166064	
6)	Depth of well confirmed at by the following manner:	initiation of plugging as: <u>29.5'</u> ft be <u>Tag line</u>	elow ground level (bgl),
7)	Static water level measured	at initiation of plugging:Dry	ft bgl
8)	Date well plugging plan of	operations was approved by the State Eng	ineer: <u>11/9/17</u>
9)	Were all plugging activities differences between the app	s consistent with an approved plugging pla proved plugging plan and the well as it was	an? <u>Yes</u> If not, please describe s plugged (attach additional pages as needed):



For each interval plugged, describe within the following columns:

III. SIGNATURE:

Arnold Lamon _, say that I am familiar with the rules of the Office of the Ι.__ State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

Signature of Well Driller

11/27/17



-

PLUGGING RECORD



	NERAL / WELL OWNE				
State E	ngineer Well Number:	<u>SJ-4105 POD3 (MU</u>	<u>J-3)</u>		
Well or	wner: El Paso CGP Com	pany, LLC	_	Phone No.: 713-420-3475	
Mailing	g address: <u>1001 Louisiana</u>	St. Room 956I			
City: <u>F</u>	Iouston	State	_TX	Zip code: 77002	_
II. WE	ELL PLUGGING INFO	RMATION:			
1)	Name of well drilling co	mpany that plugged well:	Cascad	e Drilling LP	
2)	New Mexico Well Drille	r License No.:WD-1	210	Expiration Date: 10/31/2019	_
3)	Well plugging activities	were supervised by the fol	owing well driller(s)/rig supervisor(s): <u>Arnold Lamo</u>	
4)	Date well plugging bega	n <u>11/15/17</u> Date well pl	igging concluded:	11/15/17	
5)	GPS Well Location:36.3	19720 -107.166415			
6)	Depth of well confirmed by the following manner	at initiation of plugging as Tag line	: <u>30'</u> ft bel	low ground level (bgl),	
7)	Static water level measu	ed at initiation of plugging	:Dry f	t bgl	
8)	Date well plugging plan	of operations was approved	by the State Engin	neer:11/9/17	
9)	differences between the	approved plugging plan and	the well as it was	? <u>Yes</u> If not, please descriplugged (attach additional pages as needed)	be :
					-

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume of Material Placed (gallons)	Theoretical Volume of Borehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
_	0,	10 gallons	4.9	Tremie	
_					
-					
-					
					2
-	Portland type 2 cement 5% bentonite				
-					
_					
_					
-		,			
	30'				
_					
_					
-					
_					
-					
	I				
		cubic feet x 7.4 cubic yards x 201.9	1805 = gallons		
III. SIGN	ATURE:		3		

For each interval plugged, describe within the following columns:

III

Arnold Lamon Ι, _ _, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief,

ml メ 11/27/17

Signature of Well Driller

Date





<u>I. G</u>	ENERAL / WELL OWNERSHIP:	25
State	Engineer Well Number: <u>SJ-4105 POD4 (MW-4)</u>	
Well	owner: El Paso CGP Company, LLC	Phone No.: 713-420-3475
Maili	ng address: 1001 Louisiana St, Room 956I	
City:	Houston State: <u>TX</u>	Zip code: 77002
<u>II. V</u>	VELL PLUGGING INFORMATION:	
1)	Name of well drilling company that plugged well:	Cascade Drilling LP
2)	New Mexico Well Driller License No.: <u>WD-1210</u>	Expiration Date: 10/31/2019
3)	Well plugging activities were supervised by the following well	driller(s)/rig supervisor(s): <u>Arnold Lamon</u>
4)	Date well plugging began <u>11/15/17</u> Date well plugging conc	luded: <u>11/15/17</u>
5)	GPS Well Location:36.319945 -107.166211	
6)	Depth of well confirmed at initiation of plugging as: <u>36</u> by the following manner: <u>Tag line</u>	_ ft below ground level (bgl),
7)	Static water level measured at initiation of plugging:Dry	ft bgl
8)	Date well plugging plan of operations was approved by the Stat	e Engineer: <u>11/9/17</u>
9)	Were all plugging activities consistent with an approved pluggi differences between the approved plugging plan and the well as	

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume of <u>Material Placed</u> (gallons)	Theorem I of Bo	etical Volume rehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
-	0,	12 gallons		5.9	Tremie	
<u></u>						
_						
_						
_	Portland type 2 cement 5% bentonite					
-						
_						
_						
_						
_	36					
-				ĺ		
_						
-						
		MULTIPLY	BY	AND OBTAIN	•	
		cubic feet x	7.4805 = 201.97 =	galions		
III. SIGN	ATURE:	Coolo Juida X	2031-\$f(-	Ganona		

For each interval plugged, describe within the following columns:

\mathbf{II} <u>iaiuke:</u>

I, _ Arnold Lamon _, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief,

und 11/27/17 Signature of Well Driller Date

Version: September 8, 2009 Page 2 of 2





	NERAL / WELL OWNERSHIP:	
State E	Engineer Well Number:	
Well ov	wner: El Paso CGP Company, LLC Ph	one No.: 713-420-3475
Mailing	g address: 1001 Louisiana St, Room 9561	
City: <u></u>	Houston State: TX	Zip code: <u>77002</u>
<u>II. WE</u>	ELL PLUGGING INFORMATION:	
1)	Name of well drilling company that plugged well: <u>Cascade Drilling LP</u>	
2)	New Mexico Well Driller License No.: WD-1210 E	xpiration Date: 10/31/2019
3)	Well plugging activities were supervised by the following well driller(s)/rig supervi	sor(s): <u>Arnold Lamon</u>
4)	Date well plugging began <u>11/15/17</u> Date well plugging concluded: <u>11/15/17</u>	
5)	GPS Well Location:36.319877 -107.166196	
6)	Depth of well confirmed at initiation of plugging as: <u>36.5</u> ft below ground le by the following manner: <u>Tag line</u>	evel (bgl),
7)	Static water level measured at initiation of plugging:Dry ft bgl	
8)	Date well plugging plan of operations was approved by the State Engineer:1	/9/17
9)	Were all plugging activities consistent with an approved plugging plan? <u>Ye</u> differences between the approved plugging plan and the well as it was plugged (atta	

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume of <u>Material Placed</u> (gallons)	Theoretical Volume of Borehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
	0,	40 11	6.0	Tremie	
		12 gallons			
_					
_					
_					
_					
_	Portland type 2 cement 5%				
-	bentonite				
-					
-					
_					
-					
-				121	
-					
_					
-	26.5				
_	36.5				
_					
_					
-					
_					
		MULTIPLY E	BY AND OBTAIN 805 = gallons		
		cubic feetx7.4cubic yardsx201.9	805 = gallons 97 = gallons		
II. SIGN	ATURE:				

For each interval plugged, describe within the following columns:

III. SIGNATURE:

I, <u>Arnold Lamon</u>, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief,

- an

Signature of Well Driller

11/27/17





	ERAL / WELL OWNERSHIP:	
State En	ngineer Well Number: <u>SJ-4105 POD6</u> (Nw-6)	
Well ow	mer: El Paso CGP Company, LLC	Phone No.: 713-420-3475
Mailing	address: 1001 Louisiana St, Room 9561	
City: H	ouston State: <u>TX</u>	Zip code: <u>77002</u>
	LL PLUGGING INFORMATION:	
I)	Name of well drilling company that plugged well: <u>Cascade Dr</u>	illing LP
2)	New Mexico Well Driller License No.: WD-1210	Expiration Date: 10/31/2019
3)	Well plugging activities were supervised by the following well driller(s)/ri	g supervisor(s): <u>Arnold Lamon</u>
4)	Date well plugging began <u>11/15/17</u> Date well plugging concluded: <u>11</u>	/15/17
5)	GPS Well Location:36.319803 -107.166196	
6)	Depth of well confirmed at initiation of plugging as: <u>36.2</u> ft below g by the following manner: <u>Tag line</u>	
7)	Static water level measured at initiation of plugging:Dry ft bgl	
8)	Date well plugging plan of operations was approved by the State Engineer:	11/9/17
9)	Were all plugging activities consistent with an approved plugging plan? differences between the approved plugging plan and the well as it was plug	

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume of <u>Material Placed</u> (gallons)	Theoretical Volume of Borehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
-	0,	12 gallons	<mark>5.7</mark>	Tremie	
-					
-					
]				8	
_	Portland type 2 cement 5% bentonite				
-					
_					
_	5				2 a
_					
_					
-					
-					
_					
	35.6				
-					
-					
					8
62000		MULTIPLY cubic feet x 7.	BY AND OBTAIN 4805 = gallons		
II. SIGNA	ATURE	cubic yards x 201	97 = gallons		

For each interval plugged, describe within the following columns:

Ш

____, say that I am familiar with the rules of the Office of the I, _ Arnold Lamon State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

11/27/17

Signature of Well Driller

Date





. GENERAL / WELL OWNERSHIP:						
State Engineer Well Number:						
Well owner: El Paso CGP Company, LLC Phone No.: 713-420-3475						
Mailing address: 1001 Louisiana St, Room 9561						
City: Houston Zip code: 77002						
I. WELL PLUGGING INFORMATION:						
) Name of well drilling company that plugged well: <u>Cascade Drilling LP</u>						
P) New Mexico Well Driller License No.: <u>WD-1210</u> Expiration Date: <u>10/31/2019</u>						
Well plugging activities were supervised by the following well driller(s)/rig supervisor(s):Arnold Lamo	<u>n_</u>					
Date well plugging began <u>11/15/17</u> Date well plugging concluded: <u>11/15/17</u>						
GPS Well Location:36.319867 -107166289						
b) Depth of well confirmed at initiation of plugging as: <u>36.8</u> ft below ground level (bgl), by the following manner: <u>Tag line</u>						
) Static water level measured at initiation of plugging:Dry ft bgl						
Date well plugging plan of operations was approved by the State Engineer: <u>11/9/17</u>						
Were all plugging activities consistent with an approved plugging plan? <u>Yes</u> If not, please descr differences between the approved plugging plan and the well as it was plugged (attach additional pages as needed)	ibe):					
	_					
	_					
	_					
	_					

Depth (ft bgl)	Plugging <u>Material Used</u> (include any additives used)	Volume o <u>Material Pla</u> (gallons)		oretical Volume lorehole/ Casing (gallons)	Placement <u>Method</u> (tremie pipe, other)	<u>Comments</u> ("casing perforated first", "open annular space also plugged", etc.)
_	0,	12 gallon	s	6.0	Tremie	· · · · · · · · · · · · · · · · · · ·
_						
					10.	
_	Portland type 2 cement 5%					
-	bentonite					
-						
-						
-	35.6				ст. -	
_						
-						
		MULTIPLY	ВҮ	AND OBTAIN		
		cubic feet x	7_4805	= gallons		
III. SIGN	ATURE:	cubic yards x	201.97	= gallons		

For each interval plugged, describe within the following columns:

Π

I, _ Arnold Lamon _, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

Ľ _ 11/27/17 en

Signature of Well Driller

Date