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

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-144 Revised June 6, 2013

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.

		Tr	
12815	Pit, Below-Grade Tank, or		RECEIVED By OCD at 1:52 pm, Mar 25, 2015
45-22078	Proposed Alternative Method Permit or Closure	Plan Applicat	tion
	Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternation Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or proposed alternative method	tive method	
	Instructions: Please submit one application (Form C-144) per individual pit, below	v-grade tank or alter	native request
Please be advised t environment. Nor	hat approval of this request does not relieve the operator of liability should operations result does approval relieve the operator of its responsibility to comply with any other applicable g	in pollution of surface governmental authority	e water, ground water or the v's rules, regulations or ordinances.
	ocoPhillips Company OGRID #: _21 BOX 4289, Farmington, NM 87499	17817	
Facility or well i	name: Nassau #6		
API Number: _3	0-045-22078 OCD Permit Number:		
U/L or Qtr/Qtr	I (NWSE) Section 36 Township 27N Range 12W County: SAN	JUAN	
Center of Propos	sed Design: Latitude <u>36.52931</u> <u>N</u> Longitude <u>-108.05927</u> <u>W</u> NAD:	□1927 🗵 1983	
Surface Owner:	☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment		
Temporary: Permanent Lined U String-Reinfo Liner Seams: Below-grade Volume: Tank Construction	welded Factory Other TAPPROVED Tank: Subsect on Lof 19.15.17.11 NMAC Detank: Subsect on Metal Metal Metal	ensions: Lx W Soil samples Benzene as 19.15.17.NN samples req	g Fluid yes no x D s were not tested For Required By MAC Addtional soil
☐ Visible side	ontainment with leak detection Visible sidewalls, liner, 6-inch lift and automatic owalls and liner Visible sidewalls only Other	verflow shut-off	
	Method: exception request is required. Exceptions must be submitted to the Santa Fe Environm	ental Bureau office f	or consideration of approval.
5. Fencing: Subse	ction D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-g	grade tanks)	

Four foot height, four strands of barbed wire evenly spaced between one and four feet

institution or church)

☐ Alternate. Please specify

☐ 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,

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	
s. 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 accep material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable source
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.	☐ Yes ☐ No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 Design Plan - based upon the appropriate requirements of 19.15.17.10 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 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number: or Permit Number:	9 NMAC .15.17.9 NMAC
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 do 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 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:	9.15.17.9 NMAC

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 attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.19 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 ₂ S, 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	documents are
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 Flank 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	uid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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	attached to the
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 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										
Within a 100-year floodplain.	Yes No									
- FEMA map	Yes No									
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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. Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. 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 cann 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	.11 NMAC 15.17.11 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 beli	ief.									
Name (Print): Title:										
Signature: Date:										
e-mail address:Telephone:										
OCD Approval: Cermit Application (including closure plan) Closure Plan (only) COD Conditions (see attachment)										
OCD Representative Sign A OTAPPROVED Approval Date: Title:										
OCD Representative Signs A OTAPPROVED Approval Date:										
OCD Representative Signs A OTAPPROVED Approval Date:	the closure report.									
OCD Representative Sign A C T A P P R OCD T A P P P R OCD T A P P P R OCD T A P P P P R OCD T A P P P P P P P P P P P P P P P P P P	complete this									

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report is the belief. I also certify that the closure complies with all applicable closure requirements and	true, accurate and complete to the best of my knowledge and conditions specified in the approved closure plan.
Name (Print): <u>Denise Journey</u> Title: <u>Staff Regulatory Technician</u>	
Signature: Junil Journey	Date:3/19/15
e-mail address: Denise.Journey@conocophillips.com Telephone: (505) 326-9556	

Burlington Resources Oil Gas Company, LP San Juan Basin Below Grade Tank Closure Report

Lease Name: NASSAU #6
API No.: 30-045-22078

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:

- 1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
- 2. The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.
- 3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

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

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.13 (B)(1)(b). (Sample results attached).

Components	Tests Method	Limit (mg/kg)				
Benzene	EPA SW-846 8021B or 8260B	0.2				
BTEX	EPA SW-846 8021B or 8260B	50				
TPH	EPA SW-846 418.1	100				
Chlorides	EPA 300.1	250				

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is missing due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner not found. COPC was not aware that the original notification sent at the time of Permitting was not the only closure notification required.

ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping, including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved

methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation (See Report)
 - Re-vegetation application rates and seeding techniques (See Report)
 - Photo documentation of the site reclamation (Included as an attachment)
 - Confirmation Sampling Results (Included as an attachment)
 - Proof of closure notice (Included as an attachment)

Closure Documentation was not submitted within the 60 day requirement due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to ensure closure documentation is submitted with the 60 day time frame.



624 E. Comanche

Durango, Colorado 970-403-3274

Farmington, NM 87401 505-564-2281

February 1, 2012

Shelly Cook-Cowden ConocoPhillips 3401 East 30th Street, Office #490 Farmington, NM 87402

RE: Nasssau #6 Below Grade Tank Closure Report San Juan County, New Mexico

Dear Ms. Cook-Cowden:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Nassau #6, located in San Juan County, New Mexico. Tank removal was completed by CoP contractors while AES was on site.

1.0 Site Information

1.1 Location

Site Name - Nassau #6
Legal Description - NW¼ SE¼, Section 36, T27N, R12W, San Juan County, New Mexico
Well Latitude/Longitude - N36.52948 and W108.05904, respectively
BGT Latitude/Longitude - N36.52931 and W108.05927, respectively
Land Jurisdiction — Navajo Nation
Figure 1 - Topographic Site Location Map
Figure 2 - General Site Plan, January 2012

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) and New Mexico Office of the State Engineer (NMOSE) databases were reviewed, and no prior ranking information was located. Once on site, AES personnel assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was less than 50 feet below ground surface (bgs); distance to the nearest surface water was approximately 635 feet north to Cedar Canyon; and the location is not within a well-head protection area.

1.3 BGT Closure Assessment

AES was initially contacted by Danny Rudder, CoP representative, on January 12, 2012, and on the same day, Tami Ross and Debbie Watson of AES met with Danny Rudder at the location.

AES personnel collected five soil samples from the below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, and one sample was collected from the center of the BGT footprint.

2.0 Soil Sampling

On January 12, 2012, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) from below the BGT. Soils samples were collected from approximately 6 inches below the former BGT for field screening of volatile organic compounds (VOCs), total petroleum hydrocarbon (TPH), and chlorides. Soil sample locations are included on Figure 2.

2.1 Soil 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. VOC readings from each sample were 0.0 ppm. OVM measurement locations and readings are presented in Table 1 and on Figure 2.

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. TPH concentrations for all samples were below the detection limit (20 mg/kg), and TPH results are summarized in Table 1 and on Figure 2. The AES field screening report is attached.

2.1.3 Chlorides

Soil samples were field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company. Field tests results for chloride ranged from below 20 mg/kg to 40 mg/kg. Confirmation soil samples were also collected and submitted for laboratory analysis.

Chloride field screening results are summarized in Table 1 and on Figure 2. The AES field screening report is attached.

2.2 Soil Laboratory Analyses

The five soil samples collected for laboratory analysis (S-1 through S-5) were placed into new, clean, laboratory-supplied containers, which were then labeled, placed on ice, and logged onto a sample chain of custody record. Samples were maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. The soil samples were laboratory analyzed for:

Chlorides per EPA Method 300.0

2.3 Soil Field and Laboratory Analytical Results

Field and analytical laboratory results are summarized in the table below.

Table 1. Soil OVM, TPH, and Chlorides, Nassau #6 BGT Closure, January 2012

Sample ID	Date Sampled	Depth below BGT (ft)	OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)	Laboratory Confirmation Chlorides (mg/kg)
	Action Level 19.15.17.13E)		_	100	250	250
S-1	1/12/12	0.5	0.0	<20.0	40	<30
S-2	1/12/12	0.5	0.0	<20.0	<20	<30
S-3	1/12/12	0.5	0.0	<20.0	40	<30
S-4	1/12/12	0.5	0.0	<20.0	40	<30
S-5	1/12/12	0.5	0.0	<20.0	40	<30

OVM readings, TPH and chloride concentrations for the five soil samples were either below laboratory detection limits or below applicable NMOCD action levels for contaminants of concern. Laboratory analytical reports are attached.

3.0 Conclusions

Based on field testing and laboratory analytical results for the soil samples collected on January 12, 2012, in association with the BGT closure for the Nassau #6, soil concentrations are below applicable NMOCD action levels for contaminants of concern.

Shelly Cook-Cowden Nassau #6 BGT Closure Report February 1, 2012 Page 4 of 4

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

Sincerely,

Tami Ross, CHMM Project Manager

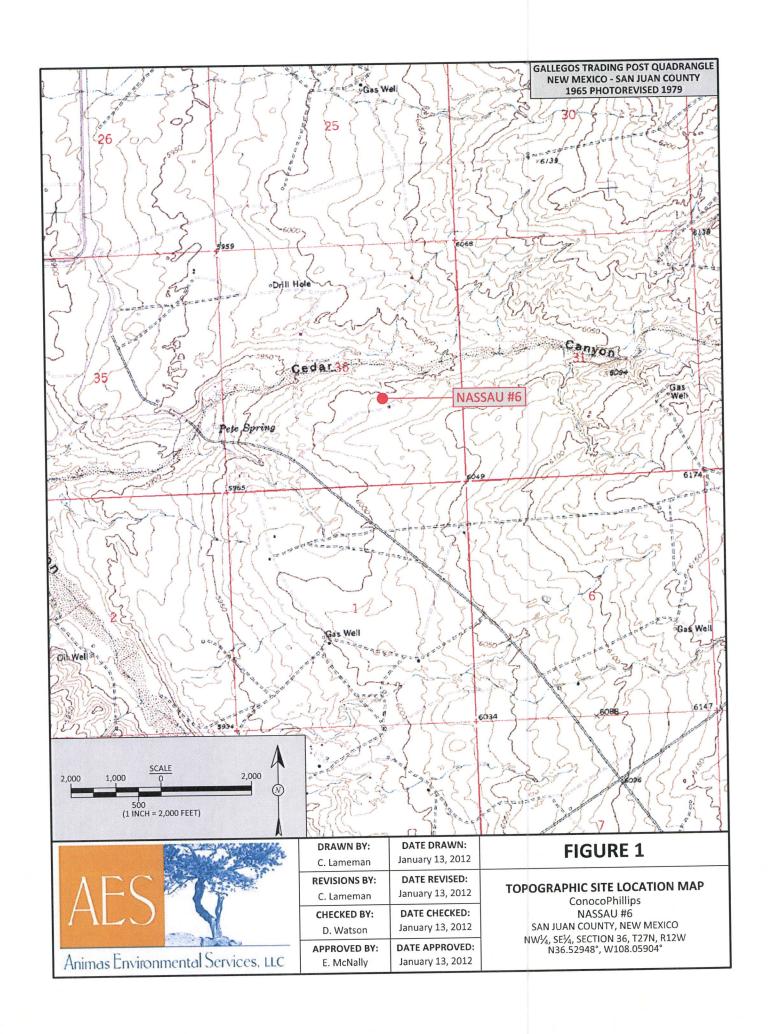
Elizabeth McNally, P.E.

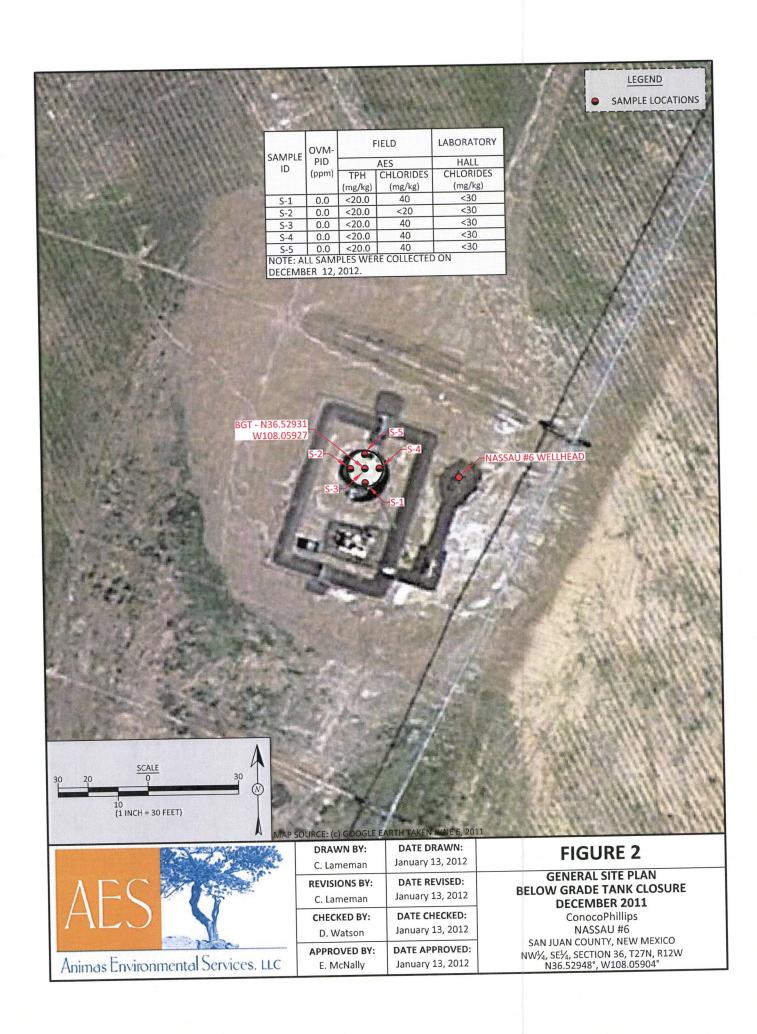
Elizabeth V MiNdly

Attachments:

Figure 1. Topographic Site Location Map Figure 2. General Site Plan, January 2012 AES Field Screening Report 011212 Hall Analytical Report 1201373

S:\Animas 2000\2012 Projects\Conoco Phillips\Nassau #6\Nassau #6 BGT Closure Report 020112.docx





AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

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

Durango, Colorado 970-403-3274

Project Location: Nassau #6

Client: ConocoPhillips

Date: 1/12/2012

Matrix: Soil

							-			
	TPH Analysts Initials	DAW	DAW	DAW	DAW	DAW				
	DF	1	1	1	1	1			N 1 46 2 17 18	a day
	TPH PQL (mg/kg)	20.0	20.0	20.0	20.0	20.0				
	Field TPH* (mg/kg)	14.2	15.5	10.3	16.9	9.0				-
	Field TPH Analysis Time	14:09	14:06	13:56	13:59	14:02				
	Field Chloride (mg/kg)	40	<20	40	40	40				
	MVO Myo	0.0	0.0	0.0	0.0	0.0		-		
	Sample Location	SOUTH	WEST	CENTER	EAST	NORTH		-		7 1 2
oil	Time of Sample Collection	12:50	12:53	12:59	13:02	13:05				
Matrix: Soil	Collection	1/12/2012	1/12/2012	1/12/2012	1/12/2012	1/12/2012				
,	Sample ID	S-1	S-2	S-3	S-4	S-5				

Practical Quantitation Limit

ND Not Detected at the Reporting Limit

Dilution Factor

*Field TPH concentrations recorded may be below PQL.

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with

Silver Nitrate

Total Petroleum Hydrocarbons - USEPA 418.1

Deman With

Analyst:



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

OrderNo.: 1201373

January 13, 2012

Ross Kennemer

Animas Environmental Services

624 East Comanche

Farmington, NM 87401

TEL: (505) 564-2281

FAX (505) 324-2022

RE: CoP Nassau #6

Dear Ross Kennemer:

Hall Environmental Analysis Laboratory received 5 sample(s) on 1/13/2012 for the analyses presented in the following report.

There were no problems with the analytical events associated with this report unless noted in the Case Narrative. Analytical results designated with a "J" qualifier are estimated and represent a detection above the Method Detection Limit (MDL) and less than the Reporting Limit (PQL). These analytes are not reviewed nor narrated as to whether they are laboratory artifacts.

Quality control data is within laboratory defined or method specified acceptance limits except if noted.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order: 1201373

Hall Environmental Analysis Laboratory, Inc. Date Reported: 1/13/2012

CLIENT: Animas Environmental Services Lab Order: 1201373 CoP Nassau #6 Project: 1201373-001 Collection Date: 1/12/2012 12:50:00 PM Lab ID: Matrix: SOIL Client Sample ID: S-1 DF **Date Analyzed** RL Qual Units Result Analyses Analyst: BRM **EPA METHOD 300.0: ANIONS** 1/13/2012 10:53:56 AM 20 mg/Kg 30 Chloride ND Collection Date: 1/12/2012 12:53:00 PM 1201373-002 Lab ID: Matrix: SOIL Client Sample ID: S-2 **RL Qual Units** DF **Date Analyzed** Result Analyses Analyst: BRM **EPA METHOD 300.0: ANIONS** 20 1/13/2012 11:11:21 AM ND 30 mg/Kg Chloride Collection Date: 1/12/2012 12:59:00 PM 1201373-003 Lab ID: Matrix: SOIL Client Sample ID: S-3 **Date Analyzed** Result RL Qual Units Analyses Analyst: BRM **EPA METHOD 300.0: ANIONS** 1/13/2012 12:03:34 PM 20 Chloride ND 30 mg/Kg Collection Date: 1/12/2012 1:02:00 PM 1201373-004 Lab ID: Matrix: SOIL Client Sample ID: S-4 **RL** Oual Units DF Date Analyzed Result Analyses Analyst: BRM **EPA METHOD 300.0: ANIONS** 1/13/2012 12:20:59 PM ND 30 mg/Kg 20 Chloride Collection Date: 1/12/2012 1:05:00 PM 1201373-005 Lab ID: Matrix: SOIL Client Sample ID: S-5 DF Date Analyzed Result **RL Qual Units** Analyses Analyst: BRM **EPA METHOD 300.0: ANIONS** 1/13/2012 12:38:24 PM 20 ND 30 mg/Kg Chloride

Qua		
i ma	1411	MX:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1201373

13-Jan-12

Client:

Animas Environmental Services

Project:

CoP Nassau #6

Sample ID: MB-250

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID: PBS Batch ID: 250

RunNo: 357

SPK value SPK Ref Val %REC LowLimit

Units: mg/Kg

HighLimit

Prep Date: 1/12/2012

Analysis Date: 1/13/2012

SeqNo: 10951

RPDLimit Qual

Analyte Chloride

Result PQL 1.5

Sample ID: LCS-250

SampType: LCS

TestCode: EPA Method 300.0: Anions

Client ID: LCSS

Batch ID: 250

RunNo: 357

Prep Date: 1/12/2012

Analysis Date: 1/13/2012

SeqNo: 10952

Units: mg/Kg

HighLimit

RPDLimit %RPD

Analyte

PQL Result

%RPD

Qual

15.00 1.5

Chloride

110

SPK value SPK Ref Val %REC LowLimit 94.0

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

Value above quantitation range Е

Analyte detected below quantitation limits

RPD outside accepted recovery limits

Analyte detected in the associated Method Blank В

Holding times for preparation or analysis exceeded H

Not Detected at the Reporting Limit

Reporting Detection Limit

Page 2 of 2



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105 TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

Sample Log-In Check List

Work Order Number: 1201373 Animas Environmental Client Name: 1/13/2012 8:50:00 AM Logged by: Michelle Garcia Completed By: Michelie Garcia 1/13/2012 9:04:54 AM 1/13/2012 Reviewed By: Chain of Custody Not Present Yes 🗌 No 🗌 1. Were seals intact? Yes V No 🗆 Not Present 2. Is Chain of Custody complete? **FedEx** 3. How was the sample delivered? Log in Yes 🗸 No 🗌 NA 🗆 4. Coolers are present? (see 19. for cooler specific information) NA 🗆 Yes 🔽 No 🗌 5. Was an attempt made to cool the samples? NA 🗆 Yes 🔽 No 🗌 6. Were all samples received at a temperature of >0° C to 6.0°C Yes 🗹 No 🗌 7. Sample(s) in proper container(s)? Yes 🔽 No 🗌 8. Sufficient sample volume for indicated test(s)? Yes 🗹 No 🗌 9. Are samples (except VOA and ONG) properly preserved? NA 🗆 Yes 🗌 No 🗹 10. Was preservative added to bottles? Yes 🗌 No 🔲 No VOA Vials 🗹 11. Is the headspace in the VOA vials less than 1/4 inch or 6 mm? Yes 🗌 No 🗹 12. Were any sample containers received broken? # of preserved Yes V No 13. Does paperwork match bottle labels? bottles checked (Note discrepancies on chain of custody) for pH: Yes 🗹 No 🗀 (<2 or >12 unless noted) 14. Are matrices correctly identified on Chain of Custody? Adjusted? Yes 🗹 No 🗌 15. Is it clear what analyses were requested? Yes 🗹 No 🗌 16. Were all holding times able to be met? Checked by (If no, notify customer for authorization.) Special Handling (if applicable) na 🗹 Yes 🗌 No 🗍 17. Was client notified of all discrepancies with this order? Date: Person Notified: eMail Phone Fax In Person Via: By Whom: Regarding: **Client Instructions:** 18. Additional remarks: 19 Cooler Information Cooler No Temp °C Condition Seal Intact Seal No Signed By Seal Date Yes

HALL ENVIRONMENTAL	ANALYSIS LABORATORY	www.hallenvironmental.com	- Albuquerque, NM 87109	Fax 505-345-4107	Analysis Request	S	.B.@)러 2(808	(AO)	(AC	Aniona (F) (A) Snoin Aniona (F) (N) 80808 (Se) 0728 (Se) (N) (N) (N) (N) (N) (N) (N) (N) (N) (N		\ \ \		***	×	<u>У</u>					anoco Phillips			es as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.
	ANALYS	www.hallenv	4901 Hawkins NE - Alb	Tel. 505-345-3975		(Vln	10 S	_{කි} ව)	PH 3 ((17 + 1 1310 418 418 504	BET Sod 8 Sod or	TEX + M TPH Meth TPH (Meth TPH (Meth	-										Remarks: Bill to Co			is possibility. Any sub-contracted data wil
Turn-Around Time:	Standard KRush STRME DAY		TOD Nassau # 6	١.,		Project Manager:	Townson Kennemer	Kess Higher	Commission Colors		Sample temperature.	Container Preservative HEALING Type and # Type	†		1 / July / 1	6	7/05	1	(mz/1				Received by: Date Time	Received by:	MI 111/12 1/3/12 8:5	accredited laboratories. This sety
Chain-of-Custody Record	Client: Act of the Man Man And Con Man	WINDS CONTINUE SAND	Mailing Address: 1,011 C Company	η 3	tarminaton NA DIACI	Phone #: CO C L DOO!	email or Fax#: (Nivation of controvention in the same of the same	OA/OC Package:		Accreditation	(poc)	Date Time Matrix Sample Request ID	_	120/2012 2-7	1010, 1753 4plc 5-7	100000000000000000000000000000000000000		120	1112112 1355 SSIL 3-3				Time:	Date: Time: Relinquished by:		If necessary, samples submitted to Hall Environmental may be subconfracted to other

<u>District I</u> 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

Form C-141 Revised August 8, 2011 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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

			Rele	ase Notific	ation	and Co	rrective A	ction	1					
						OPERATOR Initial Report Sinal R								
Name of Co						Contact Denise Journey								
Address 34			ngton, N	M 87402		Telephone No. 505-326-9556								
Facility Nan	ne Nassau	#6				Facility Typ	e Gas Well	_						
Surface Ow	ner Tribal			Mineral O	wner	Federal / Le	ease # NM-1203	30	API No.	30-045-2	22078			
				LOCA	TION	OF REI	LEASE							
Unit Letter	Section	Township	Range	Feet from the	North/	South Line	Feet from the	East/	West Line		У			
J	36	27N	12W	1850		South	1450		East		San Ju	an		
Latitude 36.52931 Longitude -108.05927														
Type of Release NONE – BGT CLOSURE SUMMARY Volume of Release N/A Volume Recovered N/A														
Source of Re		-BGI CLO	SUKE SU	WIWIAKT			lour of Occurrence	e	Date and H			N/A		
NONE						N/A								
Was Immedia	ate Notice (Yes] No 🛛 Not Ro	equired	If YES, To N/A	Whom?							
By Whom?						Date and H		1 777						
Was a Water	course Read		Yes 🗵] No		If YES, Vo	olume Impacting t	the Wat	tercourse.					
If a Watercon	urse was Im	pacted, Descr	ibe Fully.	* N/A										
	ap 11	1.0	1.1 4	T-1 * N/A										
Describe Cau	ise of Probl	em and Reme	dial Actio	n Taken.* N/A										
Describe Are	ea Affected	and Cleanup	Action Tal	ken.*										
BGT Closure	e: NO REL	EASE FOUN	D UPON	REMOVAL										
regulations a public health should their or the enviro	I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.													
	1	. \					OIL CON	SER'	VATION	DIVISI	ON			
Signature:	Du	nun Oo	mru	4			D	7						
Printed Nam	ne: Denise	Journey		V		Approved by	Environmental S	speciali	St.					
		y Technician				Approval Da	ite:		Expiration I	Date:				
E-mail Addı	ress: Denis	se.Journey@co	onocophil	lips.com		Conditions of	of Approval:			Attache	d \square			
Date: 3/19	/15	Pho	one: 505-	326-9556										

^{*} Attach Additional Sheets If Necessary

Unit Letter "J" Nassau 6 - Tribal Lease # NM-012030 API # 30-045-22078 Sec.36, T27N, R12W Longitude: 108.05828 W (NAD 27) Latitude: 36.529331 N (NAD 27) 1850' FSL & 1450' FEL

