

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 June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOC District Office.  
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC District Office.

PERMIT # 13007  
45-06213

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

RECEIVED

By OCD at 1:39 pm, Jul 09, 2015

- 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

**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: Burlington Resources OGRID #: 14538  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: Douthit #3  
API Number: 30-045-06213 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr P (SESE) Section 26 Township 27N Range 11W County: San Juan  
Center of Proposed Design: Latitude 36.541889 °N Longitude -107.96755 °W NAD: ☐ 1927 ☒ 1983  
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 \_\_\_\_\_

Closed Prior to closure plan approval

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 45 mil ☐ HDPE ☐ PVC ☒ Other LLDPE

Constituents Exceed Standards outline by 19.15.17.13 NMAC. Please submit a separate C-141 under 19.15.29 NMAC

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 \_\_\_\_\_

PC

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<sub>2</sub>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

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	



adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC  
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)  
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**Operator Application Certification:**

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

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☒ OCD Conditions (see attachment) see front

OCD Representative Signature: \_\_\_\_\_

Approval Date: Aug 07, 2015

Title: Environmental Specialist

OCD Permit Number: \_\_\_\_\_

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: July 22, 2011

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 °N Longitude °W NAD: ☐ 1927 ☐ 1983

**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): Denise Journey Title: Staff Regulatory Technician

Signature:  Date: 3/24/15

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: DOUTHIT #3**

**API No.: 30-045-06213**

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 or is not included in Paragraph (5) 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:
- Operator's name
  - 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 be 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 an 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 within the 60 day time frame.**



August 24, 2011

Project Number 92115-1856

Ms. Shelly Cook-Cowden  
Conoco Phillips  
3401 East 30<sup>th</sup> Street  
Farmington, New Mexico 87401

Phone: (505) 324-5140

**RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE DOUTHIT #3 (hBr)  
WELL SITE, SAN JUAN COUNTY, NEW MEXICO**

Dear Ms. Cook-Cowden,

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the Douthit #3 (hBr) well site located in Section 26, Township 27 North, Range 11 West, San Juan County, New Mexico. Prior to Envirotech's arrival on July 22, 2011, the BGT had been removed. A brief site assessment was conducted and the regulatory standards were determined to be 1000 ppm TPH and 100 ppm organic vapors due to horizontal distance to surface water being between 200 and 1,000 feet and depth to groundwater greater than 100 feet, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standards for TPH; see attached *Analytical Results*. Envirotech, Inc. recommends no further action in regards to this assessment.

One (1) five (5)-point composite sample was collected from beneath the former BGT. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, for organic vapors using a photoionization detector (PID), and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample returned results below the regulatory standards for benzene, BTEX and chlorides, but above regulation standards for TPH.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Conoco Phillips  
Douthit #3 (hBr)  
BGT Closure Sampling  
Project Number 92115-1856  
Page 2

Respectfully submitted,  
**ENVIROTECH, INC.**

*Crystal Delgai*  
Crystal Delgai / Environmental Field Technician  
[cdelgai@envirotech-inc.com](mailto:cdelgai@envirotech-inc.com)

Enclosures: Analytical Results  
Field Notes

Cc: Client File 92115



PAGE NO: <u>1</u> OF <u>1</u> DATE STARTED: <u>7/22/11</u> DATE FINISHED: <u>7/22/11</u>	<b>ENVIROTECH INC</b> ENVIRONMENTAL SCIENTISTS & ENGINEERS 5796 U.S. HIGHWAY 64 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615	ENVIRONMENTAL SPECIALIST: <u>C. Delgai</u> LAT: <u>36.54161</u> LONG: <u>-107.96712</u>
--	--	--

### FIELD REPORT: BGT / PIT CLOSURE VERIFICATION

LOCATION:	NAME: <u>Douglas</u>	WELL #:	3	TEMP PIT:	PERMANENT PIT:	BGT: <input checked="" type="checkbox"/>
LEGAL ADD:	UNIT: <u>P</u>	SEC: <u>26</u>	TWP: <u>27N</u>	RNG: <u>11W</u>	PM: <u>NM</u>	
QTR/FOOTAGE:	<u>990 E 990S</u>		CNTY: <u>San Juan</u>	ST: <u>New Mexico</u>		
EXCAVATION APPROX:	<u>NA</u> FT.	X	<u>NA</u> FT.	X	<u>NA</u> FT. DEEP	CUBIC YARDAGE: <u>NA</u>
DISPOSAL FACILITY:	<u>NA</u>		REMEDATION METHOD: <u>NA</u>			
LAND OWNER:			API: <u>3004506213</u>	BGT / PIT VOLUME:		
CONSTRUCTION MATERIAL:	DOUBLE-WALLED, WITH LEAK DETECTION:					

LOCATION APPROXIMATELY: 192 FT. 195-150 FROM WELLHEAD

DEPTH TO GROUNDWATER: 160'

**TEMPORARY PIT - GROUNDWATER 50-100 FEET DEEP**

BENZENE  $\leq 0.2$  mg/kg, BTEX  $\leq 50$  mg/kg, GRO & DRO FRACTION (8015)  $\leq 500$  mg/kg, TPH (418.1)  $\leq 2500$  mg/kg, CHLORIDES  $\leq 500$  mg/kg

**TEMPORARY PIT - GROUNDWATER  $\geq 100$  FEET DEEP**

BENZENE  $\leq 0.2$  mg/kg, BTEX  $\leq 50$  mg/kg, GRO & DRO FRACTION (8015)  $\leq 500$  mg/kg, TPH (418.1)  $\leq 2500$  mg/kg, CHLORIDES  $\leq 1000$  mg/kg

☒ **PERMANENT PIT OR BGT**

BENZENE  $\leq 0.2$  mg/kg, BTEX  $\leq 50$  mg/kg, TPH (418.1)  $\leq 100$  mg/kg, CHLORIDES  $\leq 250$  mg/kg


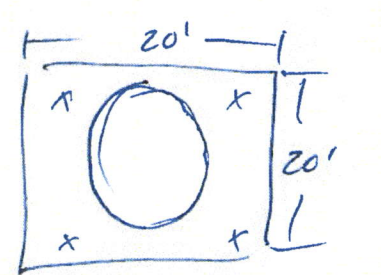
#### FIELD 418.1 ANALYSIS

TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. (mg/kg)
11:00	SOD STD		-	-	-	458	-
11:04	BGT Comp	1	5	20	4	215	300
		2					
		3					
		4					
		5					
		6					

#### PERIMETER

#### FIELD CHLORIDES RESULTS

#### PROFILE

	<table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>SAMPLE ID</th> <th>READING</th> <th>CALC. (mg/kg)</th> </tr> </thead> <tbody> <tr> <td>21510</td> <td>1.0</td> <td>28</td> </tr> <tr> <td>1</td> <td>1.2</td> <td>34</td> </tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	SAMPLE ID	READING	CALC. (mg/kg)	21510	1.0	28	1	1.2	34																									
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SAMPLE ID	RESULTS (mg/kg)																																		
1-BGT	20																																		

#### LAB SAMPLES

#### NOTES:

SAMPLE ID	ANALYSIS	RESULTS
1	BENZENE	
	BTEX	
	GRO & DRO	
	CHLORIDES	

WORKORDER #

WHO ORDERED



ConocoPhillips



**(505) 632-0615 (800) 362-1879**  
**5796 U.S. Hwy 64, Farmington, NM 87401**

Project No: 92115-1856

COC No: 12236

PAGE NO: 1 OF 1

LOCATION: NAME: Douthit WELL #: 3  
QUAD/UNIT: P SEC: 26 TWP: 27N RNG: 11W PM: NM CNTY: SJ ST: NM  
QTR/FOOTAGE: 990 FEL 990 FSL CONTRACTOR:

DATE STARTED: 7/22/11

DATE FINISHED: 7/22/11

ENVIRONMENTAL  
SPECIALIST: C. Deloria

EXCAVATION APPROX: 114 FT. X 114 FT. X 114 FT. DEEP CUBIC YARDAGE: 114

DISPOSAL FACILITY: NA REMEDIATION METHOD: NA

LAND USE: \_\_\_\_\_ LEASE: NMSE-078092 LAND OWNER: \_\_\_\_\_

CAUSE OF RELEASE: *BGT Removal* MATERIAL RELEASED: *Produced water*

SPILL LOCATED APPROXIMATELY: 192 FT. 150 FROM 11/11

DEPTH TO GROUNDWATER: 1601 NEAREST WATER SOURCE: >1600' NEAREST SURFACE WATER: 513'

NMOCd RANKING SCORE: 10 NMOCd TPH CLOSURE STD: 1000 PPM

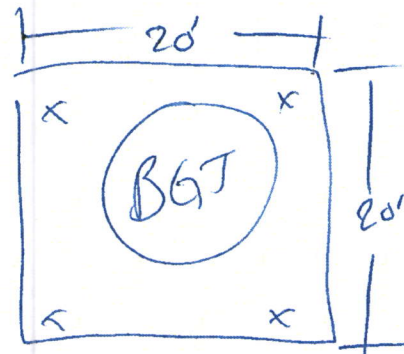
## SOIL AND EXCAVATION DESCRIPTION:

[illegible]

## SPILL PERIMETER

## OVM RESULTS

## SPILL PROFILE

[illegible]

TRAVEL NOTES: \_\_\_\_\_ CALLED OUT: \_\_\_\_\_ ONSITE: \_\_\_\_\_





CONTINUOUS CALIBRATION  
EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Cal. Date: 22-Jul-11

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	458
	200	
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

*Crystal Delgai*  
Analyst

7/29/2011

Date

Crystal Delgai  
Print Name

*Toni McKnight*  
Review

7/29/2011

Date

Toni McKnight EIT  
Print Name



EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Client: ConocoPhillips  
Sample No.: 1  
Sample ID: BGT Composit  
Sample Matrix: Soil  
Preservative: Cool  
Condition: Cool and Intact

Project #: 92115-1856  
Date Reported: 8/2/2011  
Date Sampled: 7/22/2011  
Date Analyzed: 7/25/2011  
Analysis Needed: TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	300	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Douthit #3 (hBr)

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Crystal Delgai  
Analyst

Crystal Delgai  
Printed

Toni McKnight  
Review

Toni McKnight EIT  
Printed



## Field Chloride

Client:	ConocoPhillips	Project #:	92115-1856
Sample No.:	1	Date Reported:	8/2/2011
Sample ID:	BGT Composite	Date Sampled:	7/22/2011
Sample Matrix:	Soil	Date Analyzed:	7/22/2011
Preservative:	Cool	Analysis Needed:	Chloride
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Field Chloride	34	28.0

ND = Parameter not detected at the stated detection limit.

References: "Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992  
Hach Company Quantab Titrators for Chloride

Comments: Douthit #3 (hBr)

Analyst

Crystal Delgai

Printed

Review

Toni McKnight

Printed



**EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS**

Client:	ConocoPhillips	Project #:	92115-1856
Sample ID:	BGT Composite	Date Reported:	07-25-11
Laboratory Number:	59043	Date Sampled:	07-22-11
Chain of Custody:	12236	Date Received:	07-22-11
Sample Matrix:	Soil	Date Analyzed:	07-25-11
Preservative:	Cool	Date Extracted:	07-25-11
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	ND	1.0
Ethylbenzene	ND	1.0
p,m-Xylene	ND	1.2
o-Xylene	ND	0.9
Total BTEX	ND	

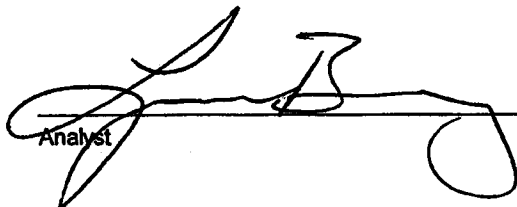
ND - Parameter not detected at the stated detection limit.

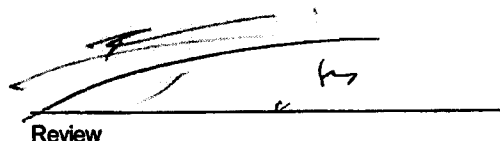
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	85.6 %
	1,4-difluorobenzene	87.1 %
	Bromochlorobenzene	87.1 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Douthit #3 (hBr)

  
Analyst

  
Review





**EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS**

Client:	N/A	Project #:	N/A
Sample ID:	0725BBLK QA/QC	Date Reported:	07-25-11
Laboratory Number:	59043	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	07-25-11
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff.	Blank Conc	Detect. Limit
		Accept: Range 0 - 15%			
Benzene	3.1217E+006	3.1279E+006	0.2%	ND	0.1
Toluene	3.1338E+006	3.1400E+006	0.2%	ND	0.1
Ethylbenzene	2.7656E+006	2.7712E+006	0.2%	ND	0.1
p,m-Xylene	7.6705E+006	7.6859E+006	0.2%	ND	0.1
o-Xylene	2.5476E+006	2.5527E+006	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	ND	ND	0.0%	0 - 30%	1.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	ND	ND	0.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	467	93.5%	39 - 150
Toluene	ND	500	455	91.0%	46 - 148
Ethylbenzene	ND	500	503	101%	32 - 160
p,m-Xylene	ND	1000	946	94.6%	46 - 148
o-Xylene	ND	500	462	92.4%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.  
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

**Comments:** QA/QC for Samples 59042-59043, 59052-59053

Analyst

Review



## Chloride

Client:	ConocoPhillips	Project #:	92115-1856
Sample ID:	BGT Composite	Date Reported:	07/25/11
Lab ID#:	59043	Date Sampled:	07/22/11
Sample Matrix:	Soil	Date Received:	07/22/11
Preservative:	Cool	Date Analyzed:	07/25/11
Condition:	Intact	Chain of Custody:	12236

Parameter	Concentration (mg/Kg)
Total Chloride	ND

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.  
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments:

Douthit #3 (hBr)

  
Analyst

  
Review

12236 RUSH

Rust



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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

Name of Company	Burlington Resources	Contact	Denise Journey
Address	3401 East 30 <sup>th</sup> St., Farmington, NM 87402	Telephone No.	505-326-9556
Facility Name	Douthit #3	Facility Type	Gas Well

Surface Owner	Federal	Mineral Owner	Federal	Lease #	SF-078092	API No.	30-045-06213
---------------	---------	---------------	---------	---------	-----------	---------	--------------

**LOCATION OF RELEASE**

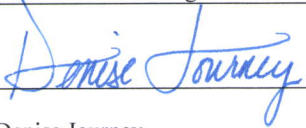
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
P	26	27N	11W	990	South	990	East	San Juan

Latitude 36.541889 Longitude -107.96755

**NATURE OF RELEASE**

Type of Release	None – BGT Closure Summary	Volume of Release	N/A	Volume Recovered	N/A
Source of Release	NONE	Date and Hour of Occurrence		Date and Hour of Discovery	
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			
If a Watercourse was Impacted, Describe Fully.*	N/A				
Describe Cause of Problem and Remedial Action Taken.*	N/A				
Describe Area Affected and Cleanup Action Taken.*	BGT Closure: NO RELEASE FOUND UPON CLOSURE				

Constituents Exceed Standards outline  
by 19.15.17.13 NMAC. Please submit a  
separate C-141 under 19.15.29 NMAC

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.		<b>OIL CONSERVATION DIVISION</b>	
Signature: 	Approved by Environmental Specialist:		
Printed Name: Denise Journey			
Title: Staff Regulatory Technician	Approval Date:	Expiration Date:	
E-mail Address: Denise.Journey@conocophillips.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3/23/15	Phone: 505-326-9556		

\* Attach Additional Sheets If Necessary

pc















**BGT Closure Packet Check List** - Well Name: Douglas 3  
 (S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\BGT Closure Check List)

✓ 12/10/14 @ Below-grade Tank Closure Report from HSE  
 (S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents))

✓ 12/10/14 @ Sampling (S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents))

NO RECORD  
FOUND

Proof of Closure (72 Hour Notice) e-mail to NMOCD E-mail notice located @  
 S:\gsREG\WELLS LIST\WELL NAME\72 Hour Notice BGT Closure (for post 2008 BGT's.) or  
 research through Jamie's Folder in LRM (subfolders designated) - some have been moved to Wells  
 List or Regulatory Pits\New Requirements\BGT\_Closure Report\_e-mails\some don't exist at all.

NO RECORD  
FOUND

Surface Owner Notification -(S:\gsREG\Wells List\Well Name) Saved copy  
 of e-mail you sent

✓ 12/10/14 @ Pictures (Pit Closure Form located @ S:\gsProj\tssjd-copy\Construction\Open Pit Inspections  
 (EEF170). Print the reclamation form for reference of Closure Date for C144 (use Start of  
 Reclamation as the Closure Date)-If Reclamation has not taken place, we only need a picture of when  
 they backfilled after removing the BGT.

12/10/14 @ C144 with correct operator, well name, lat/long., surface owner  
 (S:\gsREG\Regulatory Pits (ADM090-12yrs)\New Requirements\C-144 Forms\Pre 2013 C144 Forms/BGT  
 Closure (OLD)-Closure date for BGT's that have not had reclamation work done would be the date the  
 samples were taken when BGT was removed.

3/24/15 redone w/ new lat/long. (initials)  
 12/10/14 @ Below-grade Tank Closure Report Summary w/ C-141 ✓ redone  
 (S:\gsREG\Regulatory Pits (ADM090-12yrs)\New Requirements\BGT Closure Summary Report  
 Templates\Normal or Without Reclamation  
 C-141 found @ S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, &  
 Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks

Order for submitting the packet

1. C144 Form
2. BGT Closure Report Summary
3. Proof of Closure (72 Hour Notice) e-mail to NMOCD
4. BGT Closure Report from HSE & C141 Form
5. Sampling Results
6. Pictures

The items on this checklist need to be checked off and initialed by the person completing the work and must accompany the C-144 Closure Packet when it is handed off for QC and the QC person must initial it as well. This checklist is to be scanned into Wells List & DSM as part of the BGT Closure Packet.

Pre-BGT Closure Check List - Well Name: Douglas 3  
(S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\Pre-BGT Closure Check List)

NO RECORD  
- HISTORICAL

E-Mail received from O&M for P&A Facility Strip Notice  
(Save this e-mail in the Wells List - S:\gsREG\ Wells List under well name)

12/10/14 @

Verify Twinned Location (Check in DSM under General Tab for notes about twinned well or check 1<sup>st</sup> Delivery Database under Facilities located on MPAD)

3/24/15  
N/A

Call or e-mail Area MSO (Ask them to verify if there is a BGT on location and have them send you a picture to verify. Save the picture - S:\gsREG\ Wells List under well name)

12/10/14 @

Request Closure Plan Approval from Santa Fe - (If this is a historic BGT Closure and the well is on the BGT Master List an e-mail is sent to Leonard Lowe @ Leonrd.Lowe@state.nm.us)

N/A

Send 72-hour closure notification to NMOCD (In the e-mail received from O&M there is an 'estimated start date', use this start date when sending your 72-hour but not more than one week notice to NMOCD)

N/A

Send 72-hour Surface Owner Notification (If surface owner is BLM/Tribal then we send an e-mail notification to Mark Kelly and Shari Ketchum giving notification that a BGT will be closed) (Note: previously we were submitting the 'original' surface owner notification that was submitted with the Permit; however, that part of the process was incorrect according to Cory @ NMOCD and going forward we will need to send this notification) For the Historic Closures, we will be stating that the notification cannot be found in our Closure Summary Report.


The items on this checklist need to be checked off and initialed by the person completing the work and must accompany the C-144 Closure Packet when it is handed off for QC and the QC person must initial it as well. This checklist is to be scanned into Wells List & DSM as part of the BGT Closure Packet.



## Douthit #3

Center of Pit verified by Patsy on 3/20/15

### Legend

 36.68822 -108.18736

 36.541889 -107.96755