

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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

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.

BGT B

Pit, Below-Grade Tank, or

Proposed Alternative Method Permit or Closure Plan Application

Type of action:

- ☐ Below grade tank registration
- ☐ Permit of a pit or proposed alternative method
- ☐ Closure of a pit, below-grade tank, or proposed alternative method
- ☐ Modification to an existing permit/or registration
- ☒ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

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.

Operator: SIMCOE LLC operated by BP America Production Co.

OGRID #: 778

Address: 1199 Main Ave., Suite 101, Durango, CO 81301

Facility or well name: NORTHEAST BLANCO UNIT 016A

API Number: 3003921722

OCD Permit Number:

U/L or Qtr/Qtr J Section 3.0 Township 30.0N Range 07W County: Rio Arriba County

Center of Proposed Design: Latitude 36.838108 Longitude -107.554248 NAD: ☐ 1927 ☒ 1983

Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

☐ Pit: Subsection F, G or J of 19.15.17.11 NMAC

Temporary: ☐ Drilling ☐ Workover

☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management

☐ 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

☒ Below-grade tank: Subsection I of 19.15.17.11 NMAC

TANK ID: B

Volume: 25.0 bbl Type of fluid: Produced Water

Tank Construction material: Steel

☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off

☐ Visible sidewalls and liner ☒ Visible sidewalls only ☐ Other Double Walled Double Bottom

Liner type: Thickness mil ☐ HDPE ☐ PVC ☐ Other

4.

☐ Alternative Method:

Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)

☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)

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

☐ Alternate. Please specify

6.	Netting: Subsection E of 19.15.17.11 NMAC (<i>Applies to permanent pits and permanent open top tanks</i>) <input type="checkbox"/> Screen <input type="checkbox"/> Netting <input type="checkbox"/> Other _____ <input type="checkbox"/> Monthly inspections (If netting or screening is not physically feasible)																																																																	
7.	Signs: Subsection C of 19.15.17.11 NMAC <input type="checkbox"/> 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers <input type="checkbox"/> 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: <input type="checkbox"/> Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. <input type="checkbox"/> 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.																																																																	
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Within 100 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
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	<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 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	<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
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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Within 500 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

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC	
<i>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.</i>	
<input checked="" type="checkbox"/> Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC	<input type="checkbox"/> Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____
<input checked="" type="checkbox"/> Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC	
<input checked="" type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the requirements of 19.15.17.10 NMAC	
<input checked="" type="checkbox"/> Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC	
<input checked="" type="checkbox"/> Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC	
<input checked="" type="checkbox"/> A List of wells with approved application for permit to drill associated with the pit.	
<input checked="" type="checkbox"/> 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	
<input checked="" type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.12 NMAC	
<input checked="" type="checkbox"/> Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC	
<input checked="" type="checkbox"/> 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	
<input type="checkbox"/> Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____	

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC	
<i>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.</i>	
<input type="checkbox"/> Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC	<input type="checkbox"/> Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____
<input type="checkbox"/> Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC	
<input type="checkbox"/> A List of wells with approved application for permit to drill associated with the pit.	
<input type="checkbox"/> 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	
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<input type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
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<input type="checkbox"/> Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC	
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12.	<p>Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC</p> <p><i>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</i></p> <table><tr><td><input type="checkbox"/></td><td>Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Siting Criteria Compliance Demonstrations - based upon the requirements of 19.15.17.10 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Climatological Factors Assessment</td></tr><tr><td><input type="checkbox"/></td><td>Certified Engineering Design Plans - based upon the requirements of 19.15.17.11 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Dike Protection and Structural Integrity Design - based upon the requirements of 19.15.17.11 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Leak Detection Design - based upon the requirements of 19.15.17.11 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Liner Specifications and Compatibility Assessment - based upon the requirements of 19.15.17.11 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Quality Control/Quality Assurance Construction and Installation Plan</td></tr><tr><td><input type="checkbox"/></td><td>Operating and Maintenance Plan - based upon the requirements of 19.15.17.12 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Freelboard and Overtopping Prevention Plan - based upon the requirements of 19.15.17.11 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Nuisance or Hazardous Odors, including H₂S, Prevention Plan</td></tr><tr><td><input type="checkbox"/></td><td>Emergency Response Plan</td></tr><tr><td><input type="checkbox"/></td><td>Oil Field Waste Stream Characterization</td></tr><tr><td><input type="checkbox"/></td><td>Monitoring and Inspection Plan</td></tr><tr><td><input type="checkbox"/></td><td>Erosion Control Plan</td></tr><tr><td><input type="checkbox"/></td><td>Closure Plan - based upon the requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC</td></tr></table>	<input type="checkbox"/>	Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC	<input type="checkbox"/>	Siting Criteria Compliance Demonstrations - based upon the requirements of 19.15.17.10 NMAC	<input type="checkbox"/>	Climatological Factors Assessment	<input type="checkbox"/>	Certified Engineering Design Plans - based upon the requirements of 19.15.17.11 NMAC	<input type="checkbox"/>	Dike Protection and Structural Integrity Design - based upon the requirements of 19.15.17.11 NMAC	<input type="checkbox"/>	Leak Detection Design - based upon the requirements of 19.15.17.11 NMAC	<input type="checkbox"/>	Liner Specifications and Compatibility Assessment - based upon the requirements of 19.15.17.11 NMAC	<input type="checkbox"/>	Quality Control/Quality Assurance Construction and Installation Plan	<input type="checkbox"/>	Operating and Maintenance Plan - based upon the requirements of 19.15.17.12 NMAC	<input type="checkbox"/>	Freelboard and Overtopping Prevention Plan - based upon the requirements of 19.15.17.11 NMAC	<input type="checkbox"/>	Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan	<input type="checkbox"/>	Emergency Response Plan	<input type="checkbox"/>	Oil Field Waste Stream Characterization	<input type="checkbox"/>	Monitoring and Inspection Plan	<input type="checkbox"/>	Erosion Control Plan	<input type="checkbox"/>	Closure Plan - based upon the requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
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13.	<p>Proposed Closure: 19.15.17.13 NMAC</p> <p><i>Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.</i></p> <p>Type: <input type="checkbox"/> Drilling <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Cavitation <input type="checkbox"/> P&A <input type="checkbox"/> Permanent Pit <input checked="" type="checkbox"/> Below-grade Tank <input type="checkbox"/> Multi-well Fluid Management Pit</p> <p>Proposed Closure Method: <input checked="" type="checkbox"/> Waste Excavation and Removal <input type="checkbox"/> Waste Removal (Closed-loop systems only) <input type="checkbox"/> On-site Closure Method (Only for temporary pits and closed-loop systems) <input type="checkbox"/> In-place Burial <input type="checkbox"/> On-site Trench Burial <input type="checkbox"/> Alternative Closure Method</p>
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14.	<p>Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) <i>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.</i></p> <table><tr><td><input type="checkbox"/></td><td>Protocols and Procedures - based upon the requirements of 19.15.17.13 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Confirmation Sampling Plan (if applicable) - based upon the requirements of Subsection C of 19.15.17.13 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)</td></tr><tr><td><input type="checkbox"/></td><td>Soil Backfill and Cover Design Specifications - based upon the requirements of Subsection H of 19.15.17.13 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Re-vegetation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC</td></tr><tr><td><input type="checkbox"/></td><td>Site Reclamation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC</td></tr></table>	<input type="checkbox"/>	Protocols and Procedures - based upon the requirements of 19.15.17.13 NMAC	<input type="checkbox"/>	Confirmation Sampling Plan (if applicable) - based upon the requirements of Subsection C of 19.15.17.13 NMAC	<input type="checkbox"/>	Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)	<input type="checkbox"/>	Soil Backfill and Cover Design Specifications - based upon the requirements of Subsection H of 19.15.17.13 NMAC	<input type="checkbox"/>	Re-vegetation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC	<input type="checkbox"/>	Site Reclamation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC
<input type="checkbox"/>	Protocols and Procedures - based upon the requirements of 19.15.17.13 NMAC												
<input type="checkbox"/>	Confirmation Sampling Plan (if applicable) - based upon the requirements of Subsection C of 19.15.17.13 NMAC												
<input type="checkbox"/>	Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)												
<input type="checkbox"/>	Soil Backfill and Cover Design Specifications - based upon the requirements of Subsection H of 19.15.17.13 NMAC												
<input type="checkbox"/>	Re-vegetation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC												
<input type="checkbox"/>	Site Reclamation Plan - based upon the requirements of Subsection H of 19.15.17.13 NMAC												

15.	<p>Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC</p> <p><i>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.</i></p> <table><tr><td><input type="checkbox"/></td><td>Ground water is less than 25 feet below the bottom of the buried waste.</td><td>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Ground water is between 25-50 feet below the bottom of the buried waste</td><td>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Ground water is more than 100 feet below the bottom of the buried waste.</td><td>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>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).</td><td>- Topographic map; Visual inspection (certification) of the proposed site</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</td><td>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>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.</td><td>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Written confirmation or verification from the municipality; Written approval obtained from the municipality</td><td></td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Within 300 feet of a wetland.</td><td>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr><tr><td><input type="checkbox"/></td><td>Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance</td><td></td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr></table>	<input type="checkbox"/>	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"/>	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"/>	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"/>	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	<input type="checkbox"/>	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	<input type="checkbox"/>	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	<input type="checkbox"/>	Written confirmation or verification from the municipality; Written approval obtained from the municipality		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	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	<input type="checkbox"/>	Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance		<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	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"/>	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"/>	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"/>	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																																		
<input type="checkbox"/>	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																																		
<input type="checkbox"/>	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																																		
<input type="checkbox"/>	Written confirmation or verification from the municipality; Written approval obtained from the municipality		<input type="checkbox"/> Yes <input type="checkbox"/> No																																		
<input type="checkbox"/>	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																																		
<input type="checkbox"/>	Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance		<input type="checkbox"/> Yes <input type="checkbox"/> No																																		

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	-	Written confirmation or verification from the municipality.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine.	-	Written confirmation or verification from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area.	-	Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain.	-	FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> 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.*

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

17. **Operator Application Certification:**

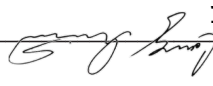
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Steve Moskal Title: Contract Environmental Coord

Signature:  Date: 2020.08.06 10:36:42

e-mail address: steven.moskal@bpx.com Telephone: (505) 330-9179

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

OCD Representative Signature:  Approval Date: 9/15/2020

Title: Environmental Specialist OCD Permit Number: BGT B

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: _____

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.*

<input type="checkbox"/>	Proof of Closure Notice (surface owner and division)
<input type="checkbox"/>	Proof of Deed Notice (required for on-site closure for private land only)
<input type="checkbox"/>	Plot Plan (for on-site closures and temporary pits)
<input type="checkbox"/>	Confirmation Sampling Analytical Results (if applicable)
<input type="checkbox"/>	Waste Material Sampling Analytical Results (required for on-site closure)
<input type="checkbox"/>	Disposal Facility Name and Permit Number
<input type="checkbox"/>	Soil Backfilling and Cover Installation
<input type="checkbox"/>	Re-vegetation Application Rates and Seeding Technique
<input type="checkbox"/>	Site Reclamation (Photo Documentation)
<input type="checkbox"/>	On-site Closure Location: Latitude _____ Longitude _____

NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): _____

Title: _____

Signature: _____

Date: _____

e-mail address: _____

Telephone: _____

SITING AND HYDRO-GEOLOGICAL REPORT FOR NORTHEAST BLANCO UNIT 016A

SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is well in excess of 100 feet (ft.). Local topography and proximity to adjacent water features were also considered. Based on a search of the New Mexico State Engineer's Office (attached), there are no freshwater wells or springs used for public or livestock consumption within 200 horizontal ft. (Figure 1) of the below-grade tank (BGT). The site had a cathodic ground bed installed in 1993 and recorded groundwater at approximately 170 ft. below grade (attached). A topographic map (Figure 2) demonstrates that the BGT is not within 100 ft. of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake as measured from the ordinary high water mark.

LOCAL GEOLOGY AND HYDROLOGY

The well site is located on a mesa top approximately 0.6 miles, S24.5°E of Navajo Reservoir. The mesa is composed of the Nacimiento Formation. Broad shaley hills are interspersed with sandstone outcrops and systems of canyons and surface drainages leading into the reservoir. The BGT ground level elevation (6,316 ft.) is greater than 231 ft. when the reservoir is at its maximum capacity (estimated at 6,085 ft.).

REGIONAL GEOLOGY AND HYDROLOGY

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2,232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1,000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft/d (Stone et al., 1983). Groundwater within these aquifers flows toward the San Juan River.

REFERENCES

Circular 154-Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p

DATA SHEET FOR DEEP GROUND BED CATHODIC PROTECTION WELLS

NORTHWESTERN NEW MEXICO
(Submit 3 Copies to OCD Aztec Office)

Operator: BLACKWOOD & NICHOLS CO. Location: Unit 1, Sec. 3, Twp 30N, Rng 7W.

Name of Well/Wells or Pipeline Serviced NEBU 16A

Elevation 6300' Completion Date 6-21-93 Total Depth 372' Land Type* Surface: F Mineral: SF-079001

Casing, Sizes, Types & Depths 8-5/8" SCH 40 P.V.C. - 100', 7 7/8" OPEN HOLE.

If Casing is cemented, show amounts & types used 20 sks Portland Zia I-II

If Cement or Bentonite Plugs have been placed, show depths & amounts used N/A

Depths & thickness of water zones with description of water when possible:

Fresh, Clear, Salty, Sulphur, Etc. Fresh 170'

Depths gas encountered: N/A

Type & amount of coke breeze used: Asbury Recarburiizer

Depths anodes placed: 355' to 190' (10 anodes)

Depths vent pipes placed: 372' to 4' above ground level

Vent pipe perforations: 372' to 112'

Remarks:

If any of the above data is unavailable, please indicate so. Copies of all logs, including Drillers Log, Water Analyses & Well Bore Schematics should be submitted when available. Unplugged abandoned wells are to be included.

*Land Type may be shown: F-Federal; I-Indian; S-State; P-Fee.
If Federal or Indian, add Lease Number.

Signed by: James K. Lee

Title: Operations Engineer Date: 8/11/93

30-039-21722

1115 Farmington Avenue - Farmington, NM 87401
(505) 325-1085

Standard A.P.I. Water Analysis Report

Collected By: Loftis

Collection Date: 21-Jun-93

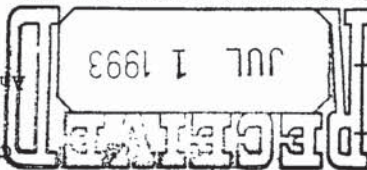
Collection Time: Unknown

County: Unknown

State: Unknown

Analyst: K. Lambdin and S. Spencer

BLACKWOOD & NICHOLS CO., LTD.



Company: Blackwood and Nichols Co.

Well Name: SN - 18

Formation: Unknown

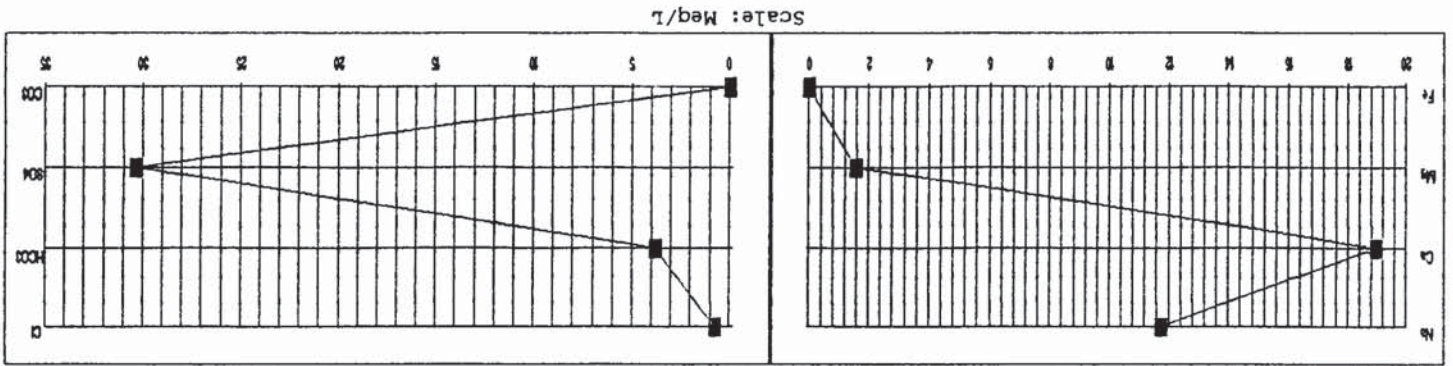
Location: Groundbed

Remarks: Depth - 170 feet

PARAMETER	AS. ION	Comment
Sodium, Na	270 mg/l	
Potassium, K	4 mg/l	
Calcium, Ca	380 mg/l	
Magnesium, Mg	19 mg/l	
Iron, Fe (Total)	0.0 mg/l	NR
Hydrogen Sulfide	0 mg/l	NR
pH	6.95 Units	
TDS	1,698 mg/l	
Remarks:	None	
NR = Test Not Run		
Chloride, Cl	27 mg/l	
Sulfate, SO ₄	1461 mg/l	
Hydroxide, OH	0 mg/l	
Carbonate, CO ₃	0 mg/l	
Bicarbonate, HCO ₃	233 mg/l	
Resistivity	3.968 ohm-m	
Conductivity	2,520 us	
Specific Gravity	1.001 Units	
(@ 60 Degrees F)		

Anion/Cation: 108.08

Stiff Diagram



BLACKWOOD & NICHOLS
CATHODIC GROUND BED
DRILLERS REPORT

P# 5N-18 WELL# N.E.B.U. # 16-A

J S 3 T 30 R 7

DEPTH	STRATA	NOTES	DEPTH	STRATA	NOTES
2-100	2-100				
100-180	Sandstone (water-seep)				
180-230	Black-shale (170)				
230-255	Grey Sandstone				
255-265	Grey Shale				
265-280	Grey Sandstone				
280-295	Grey Shale				
295-380	Grey Sandstone				

DRILLER

INSPECTOR

Mark D. McAlister

92



New Mexico Office of the State Engineer

Wells Without Well Log Information

No wells found.

Basin/County Search:

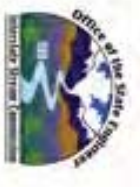
Basin: San Juan **Subbasin:** San Juan

UTMAD83 Radius Search (in meters):

Easting (X): 272230.75

Northing (Y): 4079958.5

Radius: 60.96 **= 200 ft.**



New Mexico Office of the State Engineer

Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

Basin: San Juan

Subbasin: San Juan

UTMNA D83 Radius Search (in meters):

Easting (X): 272230.75

Northing (Y): 4079958.5

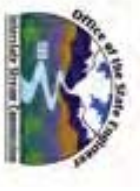
Radius: 60.96 = **200 ft.**

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

8/6/20 6:34 AM

Page 1 of 1

POINT OF DIVERSION WITH METER ATTACHED



New Mexico Office of the State Engineer

Wells with Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

Subbasin: San Juan

UTM NAD83 Radius Search (in meters):

Easting (X): 272230.75

Northing (Y): 4079958.5

Radius: 60.96

= 200 ft.

The data is furnished by the NMOSF/ISC and is accepted by the recipient with the expressed understanding that the OSF/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

8/6/20 6:32 AM

SIMCOE LLC - NEBU 016A

(J) Section 3, T30N, R07W
API #: 3003921722

Imagery date: 10/5/2016
WH GPS Coord.: 36.838319,-107.554142
25 bbl BGT GPS Coord.: 36.838108,-107.554248

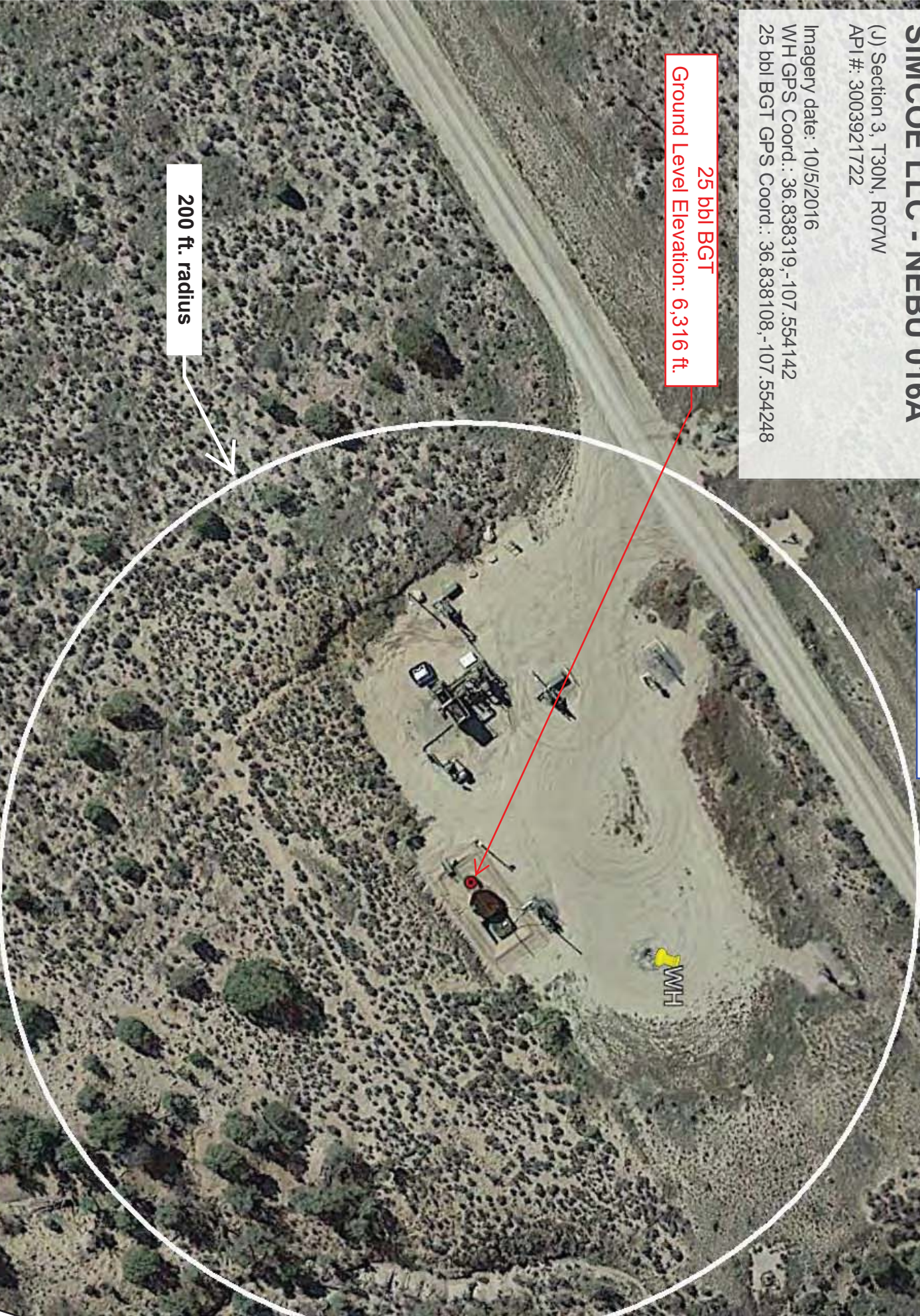
FIGURE 1

25 bbl BGT

Ground Level Elevation: 6,316 ft.

200 ft. radius

Spring & Water Well Proximity



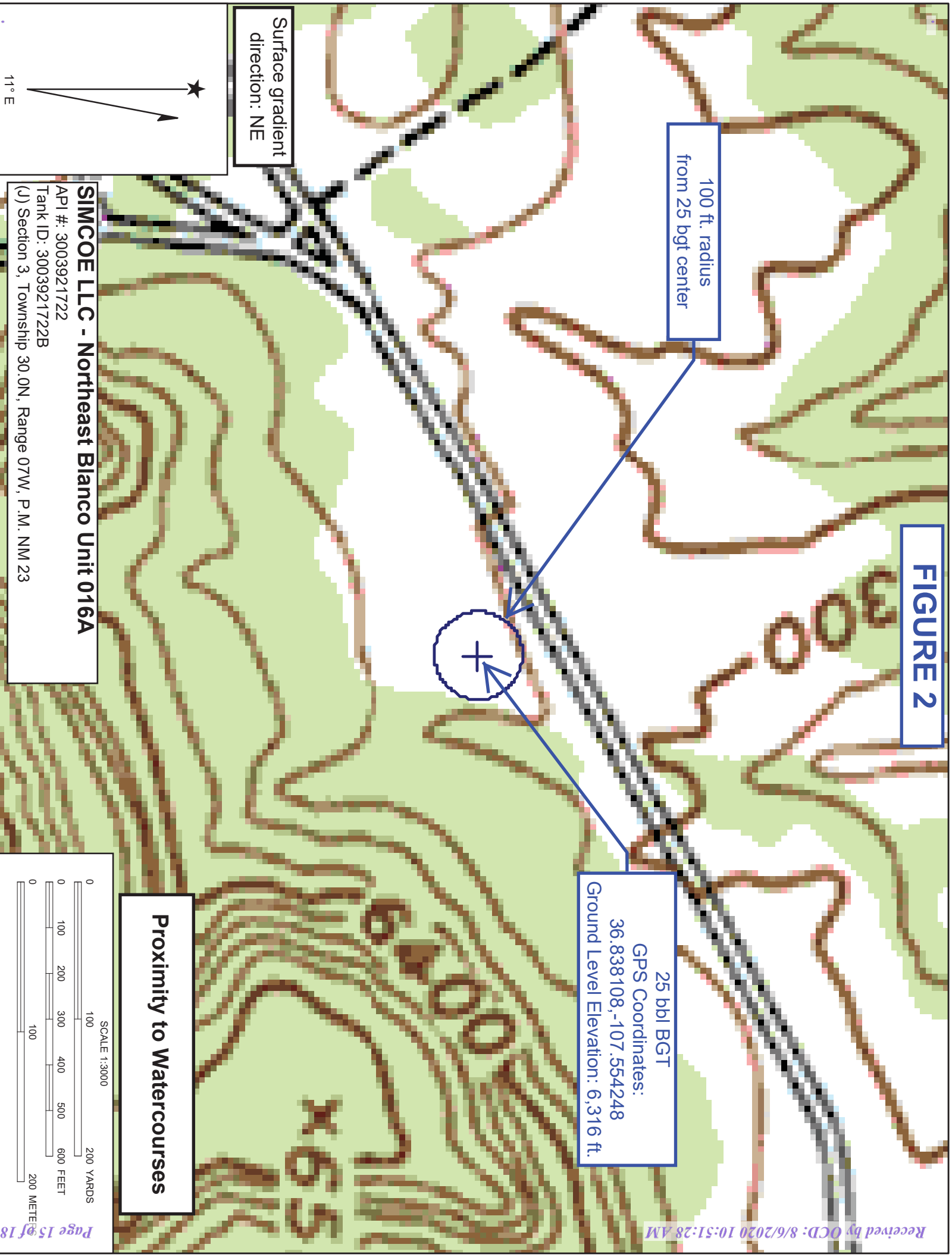
Google Earth

© 2020 Google

200 ft



FIGURE 2



SIMCOE LLC - Northeast Blanco Unit 016A

API #: 3003921722

Tank ID: 3003921722B

(J) Section 3, Township 30.0N, Range 07W, P.M. NM 23

SIMCOE LLC (formerly BPX Energy Inc.)
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on SIMCOE LLC (SIMCOE) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, SIMCOE will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, SIMCOE will request preapproval from the Division District III office of any specific changes and will be included on form C-144. SIMCOE shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

General Closure Plan

1. SIMCOE shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advance, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
2. SIMCOE shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
3. Within 60 days of cessation of operations, SIMCOE shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD approved facility. The facilities to be used are:
 - a. SIMCOE LLC Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - e. SIMCOE LLC Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - f. SIMCOE LLC Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - g. SIMCOE LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - h. SIMCOE LLC Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - i. SIMCOE LLC Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - j. SIMCOE LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - k. SIMCOE LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
4. SIMCOE shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
5. Within six months of cessation of operations, SIMCOE shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
6. SIMCOE shall test the soils beneath the BGT to determine whether a release has occurred. SIMCOE shall collect at a minimum: a five (5) point composite sample to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table I on following page).

Table 1
Closure Criteria for Soils Beneath Below-Grade Tanks

Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**					
≤50 feet	Chloride	EPA 300.0	600 mg/kg					
	TPH	EPA SW-846 Method 418.1	100 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					
	Chloride	EPA 300.0	10,000 mg/kg					
51 feet-100 feet	TPH	EPA SW-846 Method 418.1	2,500 mg/kg					
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					
	Chloride	EPA 300.0	20,000 mg/kg					
> 100 feet	TPH	EPA SW-846 Method 418.1	2,500 mg/kg					
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					
	Chloride	EPA 300.0	20,000 mg/kg					

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.
* - Or other test methods approved by the division
** - Numerical limits or natural background level, whichever is greater

7. If any contaminant concentration exceeds those standards set in Table I, SIMCOE will acknowledge NMOC's position to require additional delineation upon review of the results. SIMCOE will not proceed with any further closure activities until approval is first granted by NMOC.
8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then SIMCOE shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
9. SIMCOE shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. SIMCOE shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) of Subsection H of 19.15.17.13 NMAC.
10. SIMCOE may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOC's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. SIMCOE will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOC for its approval.
11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.

12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.
13. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and 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.
17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of SIMCOE subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
19. Within 60 days of closure completion, SIMCOE shall submit a closure report on NMOCD's form C-144, and will include the following:
 - a. necessary attachments to document all closure activities
 - b. sampling results
 - c. information required by 19.15.17 NMAC
 - d. details on back-filling, capping and covering, where applicable.
20. SIMCOE shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.