District I
1625 N French Dr , Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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
July 21, 2008

**For temporary pits, closed-loop systems, and below-grade tanks**, submit to the appropriate NMOCD District Office.
**For permanent pits and exceptions** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office

10301

# Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

***Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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: EnerVest Operating, LLC OGRID # 143199
Address 1001 Fannin St. Ste 800 Houston, Texas 77002
Facility or well name: Jicarilla Contract 146 #019
API Number: 30-039-20211 OCD Permit Number:
U/L or Qtr/Qtr A Section 4 Township 25N Range 5W County: Rio Arriba
Center of Proposed Design: Latitude 36.433188 Longitude 107.358321 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment

2
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ 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_____

RCVD AUG 8 '12
OIL CONS. DIV.
DIST. 3

3.
☐ **Closed-loop System:** Subsection H of 19.15.17 11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 95 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 See closure plan
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☒ Other Below grade tank to be closed per NMAC 19 15 17.13

5.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval

6.

**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_Four foot hog wire_____

7.

**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)

8.

**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 15.3 103 NMAC

9.

**Administrative Approvals 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:***

☐ Administrative approval(s) Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

**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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance.*** **Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.**

| | |
|---|---|
| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No |
| 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).<br>- 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 *(Applies to temporary, emergency, or cavitation pits and below-grade tanks)*<br>- Visual inspection (certification) of the proposed site, Aerial photo; Satellite image | ☐ Yes ☐ No ☐ NA |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to permanent pits)*<br>- Visual inspection (certification) of the proposed site, Aerial photo; Satellite image | ☐ Yes ☐ No ☐ NA |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database search, Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- 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<br>- FEMA map | ☐ Yes ☐ No |

11.
**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: _____

12.
**Closed-loop Systems 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.***

☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: _____

☐ Previously Approved Operating and Maintenance Plan API Number: _____ *(Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)*

13.
**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC
***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19 15.17 11 NMAC
☐ Nuisance or Hazardous Odors, including $H_2S$, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15 17 9 NMAC and 19.15.17.13 NMAC

14.
**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 ☐ Closed-loop System ☐ 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15
**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 F 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 I of 19.15.17.13 NMAC
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15.17 13 NMAC

16

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19 15.17.13.D NMAC)

***Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.***

Disposal Facility Name: _____ Disposal Facility Permit Number: ____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please provide the information below) ☐ No

*Required for impacted areas which will not be used for future service and operations*

☐ 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 I of 19.15.17.13 NMAC

☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.***

| | |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| Ground water is more than 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| 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).<br>- 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.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application<br>- NM Office of the State Engineer - iWATERS database, Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map, Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- 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<br>- FEMA map | ☐ Yes ☐ No |

18.

**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 F of 19.15.17 13 NMAC

☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17 13 NMAC

☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19 15.17.13 NMAC

☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17 13 NMAC

19.
**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): Janet Bienski Title: Associate Regulatory Analyst

Signature: Janet M Bienski Date: 07/25/2012

e-mail address: jbienski@enervest.net Telephone 713-495-1571

20.
**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** Jonathan D. Kelly **Approval Date:** 8/10/2012

**Title:** Compliance Officer **OCD Permit Number:**

21.
**Closure Report (required within 60 days of closure completion):** Subsection K of 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:** 4/21/2011

22.
**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.

23
**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

***Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.***

Disposal Facility Name Disposal Facility Permit Number:

Disposal Facility Name. Disposal Facility Permit Number.

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

*Required for impacted areas which will not be used for future service and operations*

☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24
**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)
☐ Plot Plan (for on-site closures and temporary pits)
☐ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☐ Disposal Facility Name and Permit Number
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique
☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude Longitude NAD ☐1927 ☐ 1983

25
**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:

NEW MEXICO OIL CONSERVATION COMMISSION

# WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102
*Supersedes C-128*
Effective 1-1-65

All distances must be from the outer boundaries of the Section.

| Operator | Lease | Well No. |
|---|---|---|
| Pan American Petroleum Corp. | Jicarilla Contract 146 | 19 |

| Unit Letter | Section | Township | Range | County |
|---|---|---|---|---|
| A | 4 | 25N | 5W | Rio Arriba |

Actual Footage Location of Well:
990 feet from the North line and 1070 feet from the East line

| Ground Level Elev. | Producing Formation | Pool | Dedicated Acreage: |
|---|---|---|---|
| 6616 (ungraded) | Dakota | Basin Dakota | 318.6 N/2 Acres |

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.

2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).

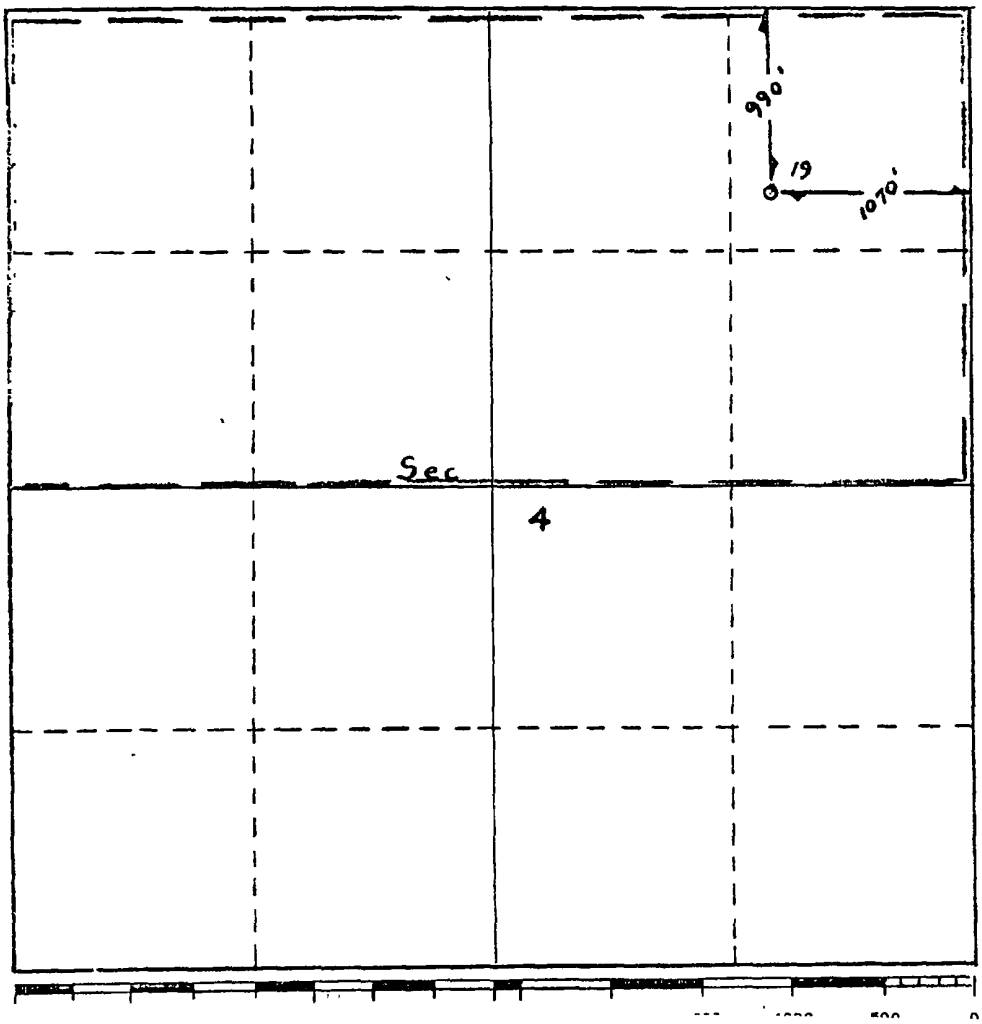
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling. etc?

☐ Yes ☐ No If answer is "yes," type of consolidation _____

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.

RECEIVED
MAY 26 1969
OIL CON. COM.
DIST. 3




## CERTIFICATION

*I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.*

Name: G. W. Eaton, Jr.

Position: Area Engineer

Company: PAN AMERICAN PETROLEUM CORP.

Date: May 21, 1969

*I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.*

Date Surveyed: May 17, 1969

Registered Professional Engineer and/or Land Surveyor

Certificate No. 3950

# EnerVest Operating, LLC

**Below-Grade Tank**
**Closure Report**

**Lease & Well: Jicarilla Contract 146 #19**
**API No: 30-039-20211**

In accordance with Rule 19.15.17.13 NMAC, the following information describes the closure of the below-grade tank on the above well. All proper documentation regarding closure activities is being included with the C-144, closure report. This below-grade tank was constructed prior to June 16, 2008, the effective date of this rule.

The surface owner shall be notified of the closure of this below-grade tank.

**Manuel Myore/Bureau of Indian Affairs was notified of the closure of this below-grade tank via U. S. Mail Registered Mail with a Return Receipt Requested on March 25, 2011.**

At least a 72 hour notice will be given to the appropriate division district office, via U. S. Mail or electronic e-mail, prior to the closure of any below-grade tank.

**The Aztec OCD Office was notified on April 15, 2011 via email of the proposed closure operations for this below-grade tank.**

All free standing liquids will be removed prior to any other activity concerning the closure of the below-grade tank. All liquids were disposed of in a division-approved facility in a manner that the appropriate division district office approves.

**All recovered liquids were disposed of at TNT Land Farm/Permit #NM-01-008,. This below-grade tank was steam-cleaned and sold for private use.**

Upon removal of the below-grade tank from its containment area, the surface directly below this tank will be inspected for any visible signs of leakage. If leakage is detected, a grab sample will be taken from that area. Also, a five point composite sample will be taken from where the tank was sitting. All samples will be analyzed for the following:

| Components | Test Method | Limits (mg/Kg) | Sample Results |
|---|---|---|---|
| Benzene | EPA SW-846 8021B or 8260B | 0.2 | .050 |
| BTEX | EPA SW-846 8021B or 8260B | 50 | .150 |
| TPH | EPA SW-846 418.1 | 100 | 10 |
| Chlorides | EPA 300.1 | 250 or background, whichever is greater | 16 |

The results of all sampling shall be reported to the division on Form C-141.

**Upon removal of this below-grade tank, there was no visible evidence of any leakage. a five point composite sample was taken from where the tank was sitting. The samples were sent in for analysis and the results reported to the OCD Aztec Office on C-141. The results of all testing were within tolerance levels as established by the OCD.**

Upon sampling has confirmed no leaks were evidence, the area was back filled and surrounding area restored. These below-grade tanks are on the approved pad sites and no re-seeding was performed.

Photographic evidence of this work was taken and will be submitted with our completed C-144 for the closure of this below-grade tank.

ENERVEST

CERTIFIED MAIL W/ RETURN RECEIPT
7009-2250-0003-1416-2996

March 25, 2011


Mr. Manuel Myore
Bureau of Indian Affairs
Jicarilla Agency
Branch of Real Property
P. O. Box 167
Dulce, New Mexico 87528

RE: Closure of Below-Grade Tank
Jicarilla Contract 146 #019
API 30-039-~~20122~~ 20211

Dear Mr. Myore,

In an effort to be in compliance with NMAC 19.15.17.13 (J) regarding notifications to surface owners concerning the closure of below-grade tanks, please be advised that EnerVest Operating, LLC is in process of preparing OCD Form C-144 to close the below-grade tank(s) on the above referenced property.

The tank located on this site is a below-grade tank and is no longer necessary. EnerVest has permanently plugged and abandoned this well. It is our intent to close this tank by June, 2011. This timeline is completely dependent upon the availability of equipment, testing requirements, and weather conditions. Enervest will fully comply with NMAC 19.15.17.13 (E) in all work performed.

If you have any questions regarding this process, please feel free to contact the undersigned at 713-495-1571 at any time.

Sincerely,

Janet M. Bienski
Reguatory Assistant
EnerVest Operating, LLC
Western Division

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Manuel Myore
Bureau of Indian Affairs
Jicarilla Agency
Branch of Real Property
P. O. Box 167
Dulce, New Mexico 87528

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7009-2250-1416-2996

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540


**EnerVest Operating, LLC (EV)**

**BELOW-GRADE TANK**
**CLOSURE REQUIREMENTS**

**Rule 19.15.17.13**

J. EV shall research county tax records to determine the name and address of the surface owner of the properties involved. EV shall notify this surface owner via certified mail, return receipt requested that the closure of a below-grade tank is being planned.

EV will notify the appropriate district office prior to any closure operations beginning. Such notification shall be at least 72 hours prior to beginning work but not more than one week prior to beginning work. Such notice shall contain at a minimum the following:

Operators Name
Unit letter, Section, Township, & Range of well
Lease name and well number
API Number of well

A. EV shall close all existing below-grade tanks which do not meet the requirements of NMAC 19.15.17.11 by June 15. 2013 or retrofit each one to insure total compliance with the subsections of 19.15.17.11 before June 15, 2013.

Within 60 days of cessation of the below-grade tanks operation or as required by Subsection B of 19.15.17.17 NMAC, EV shall close the below-grade tank in accordance with a closure plan that the appropriate division district office approves.

E. .All free standing liquids will be removed at the start of the pit closure process from the pit and disposed of in one of the below division-approved facility as indicated below:

| | |
|---|---|
| TNT Land Farm | Permit # NM-01-0008 |
| Environtech Land Farm | Permit # NM-01-0011 |

EV will remove the below-grade tank and steam clean in an attempt to put back into service. If the tank is not reusable it will be disposed of, after cleaning, by crushing or cutting into pieces and sold for scrap iron.

EV will remove any and all on-site equipment associated with the below-grade tank, unless it is used elsewhere for other purposes.

In instances where there are multiple below-grade tanks on site, EV will make every attempt to limit the new below-grade tanks to a single unit. This will be dependent on possible hazardous road conditions during the winter months.

Upon removal of the below-grade tank, EV will inspect the area previously beneath the below-grade tank looking for any wet, discolored, or any other showing evidence of a release. Upon such discovery, EV will take, at a minimum, a five point composite sample; collect individual grab samples and analyze for the following:

| Components | Test Method | Limits (mg/Lg) |
|---|---|---|
| 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 or background, whichever is greater |

EV will insure that the results of all sampling shall be reported to the division on approved form C-141.

If there is no indication of any release due to the absence of wet, discolored, or any other evidence or sampling demonstrates that concentrations specified above have NOT been exceeded, or that a release has NOT occurred, EV will backfill the excavation with compacted, non-waste containing, earthen material, construct a division prescribed soil cover, and recontour and re-vegetate the site. The division prescribed soil cover, recontouring, and re-vegetation shall comply with 19.15.17.13.

If it has been determined that a release HAS OCCURRED, EV will immediately begin the notification process, dependent upon the determination of a MAJOR or MINOR release, as defined in 19.15.29.7(A)(B). Within 24 hours the appropriate division district office and the Division Environmental Chief will receive verbal notification of such a release, to include well name and number, location, API No., and type & amount of release. Within fifteen (15) days, the appropriate division district office and the Division Environmental Chief will receive a completed form C-141, outlining the details of the release.

Any and all contaminated soil or sludge will be removed and transported to one of the following:

| | |
|---|---|
| TNT Land Farm | Permit # NM-01-0008 |
| Environtech Land Farm | Permit # NM-01-0011 |

EV will insure the site shall be contoured to blend in with the surrounding terrain.

EV will insure the soil cover shall consist of the background thicknes of topsoil or one foot of suitable material for establishing vegetation at the site, which ever is greater.

EV will insure the soil shall be spread in such a manner as to prevent the pooling of water

If the reclaimed area is NOT part of the pad area, the area shall be reseeded at the first growing season after the completion of all work. The seed mixture shall be drilled on the contour whenever practical and comprised of Jicarilla Apache Tribal approved mixture. At least 70 percent of the native perennial cover (unimpacted by overgrazing, fire, or other intrusive damage) shall be maintained through two successive growing seasons. Irrigation will not be used to accomplish the required ground cover.

Within 60 days of completion of closure operations, EV will file Form C-144, with attachments, outlining the detailed operations of the closing operations.

## Bienski, Janet

**From:** Bienski, Janet
**Sent:** Friday, April 15, 2011 12.03 PM
**To:** 'Powell, Brandon, EMNRD'
**Cc:** Young, Ronnie
**Subject:** BGT closures - JIC Ap Trib 151 #1 and Jic C 146 #19

Please be advised that we will be closing the below mentioned tanks on Thursday, April 2.

**Jicarilla Apache Tribal 151 #1**, API 30-039-08166, Unit Letter N, Section 10, Township 26N, Range 05W

**JICARILLA CONTRACT 146 No. 019,** API 30-039-20211, Unit Letter A, Section 4, TS 25N, Range 05W

Please contact me should there be any problems with this notice. Thank you.

Janet Bienski
Regulatory Assistant
713-495-1571
jbienski@enervest.net

**Bienski, Janet**

**To:** Powell, Brandon, EMNRD
**Subject:** Jicarilla Contract 146 #019 (API No. 30-039-20211)

Jicarilla Contract 146 #19
30-039-20211
Rio Arriba County, NM

On June 13, 2011, we removed the existing below-grade tank. Pit was tested - no contamination found. Pit back filled with dirt and below grade tank was hauled off.

We have photographic evidence of our work on file should you need to see it.

Janet Bienski
Regulatory Assistant
713-495-1571
jbienski@enervest.net

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 EnerVest Operating, LLC | Contact Janet M. Bienski |
| Address 1001 Fannin Street, Ste. 800, Houston, Tx 77002 | Telephone No 713-495-1571 |
| Facility Name Jicarilla Contract 146 #19 | Facility Type Below Grade Tank Closure |

| | | |
|---|---|---|
| Surface Owner Jicarilla Apache Nation | Mineral Owner | API No. 30-039-20211 |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| A | 4 | 25N | 05 W | 990 | North | 1070 | East | Rio Arriba |

**Latitude** 36.433188 **Longitude** 107.358321

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release None | Volume of Release | Volume Recovered |
| Source of Release | Date and Hour of Occurrence | Date and Hour of Discovery |
| Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required | If YES, To Whom? | |
| By Whom? | Date and Hour | |
| Was a Watercourse Reached? ☐ Yes ☐ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully *

Describe Cause of Problem and Remedial Action Taken *

No release detected – Closure of below-grade tank

Describe Area Affected and Cleanup Action Taken.*

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

| | | |
|---|---|---|
| Signature: Janet M Bienski | OIL CONSERVATION DIVISION | |
| Printed Name: Janet M Bienski | Approved by Environmental Specialist | |
| Title: Associate Regulatory Analyst | Approval Date | Expiration Date |
| E-mail Address: jbienski@enervest net | Conditions of Approval: | Attached ☐ |
| Date: 08/01/2012 Phone: 713-495-1571 | | |

* Attach Additional Sheets If Necessary

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

April 08, 2011

LEE GARDNER

ENERVEST

2700 FARMINGTON BLD K SUITE #1

FARMINGTON, NM 87401

RE: SOIL SAMPLES

Enclosed are the results of analyses for samples received by the laboratory on 04/06/11 9:30.

Cardinal Laboratories is accredited through Texas NELAP for:

| | |
|---|---|
| Method SW-846 8021 | Benzene, Toluene, Ethyl Benzene, and Total Xylenes |
| Method SW-846 8260 | Benzene, Toluene, Ethyl Benzene, and Total Xylenes |
| Method TX 1005 | Total Petroleum Hydorcarbons |

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

| | |
|---|---|
| Method EPA 552.2 | Haloacetic Acids (HAA-5) |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V2, V3) |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

## *Analytical Results For:*

ENERVEST
LEE GARDNER
2700 FARMINGTON BLD K SUITE #1
FARMINGTON NM, 87401
Fax To: NOT GIVEN

| | | | |
|---|---|---|---|
| Received: | 04/06/2011 | Sampling Date. | 04/05/2011 |
| Reported· | 04/08/2011 | Sampling Type: | Soil |
| Project Name: | SOIL SAMPLES | Sampling Condition: | Cool & Intact |
| Project Number. | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | NOT GIVEN | | |

**Sample ID: 146 - 19 (H100680-01)**

**BTEX 8021B** mg/kg **Analyzed By: CMS**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| Benzene* | <0.050 | 0.050 | 04/07/2011 | ND | 1.72 | 86.0 | 2.00 | 2.93 | |
| Toluene* | <0.050 | 0.050 | 04/07/2011 | ND | 1.79 | 89.6 | 2 00 | 2.27 | |
| Ethylbenzene* | <0.050 | 0 050 | 04/07/2011 | ND | 1.84 | 92.2 | 2.00 | 3.11 | |
| Total Xylenes* | <0.150 | 0.150 | 04/07/2011 | ND | 5.55 | 92.5 | 6.00 | 2.34 | |

*Surrogate 4-Bromofluorobenzene (PIL* *92 4 %* *70-130*

**Chloride, SM4500Cl-B** mg/kg **Analyzed By: HM**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| Chloride | <16.0 | 16.0 | 04/07/2011 | ND | 416 | 104 | 400 | 3.77 | |

**TPH 8015M** mg/kg **Analyzed By: AB**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| GRO C6-C10 | <10.0 | 10.0 | 04/08/2011 | ND | 214 | 107 | 200 | 1.23 | |
| **DRO >C10-C28** | **12.0** | 10.0 | 04/08/2011 | ND | 204 | 102 | 200 | 6.06 | |

*Surrogate 1-Chlorooctane* *114 %* *70-130*

*Surrogate 1-Chlorooctadecane* *124 %* *70-130*

Cardinal Laboratories *=Accredited Analyte



Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

## *Analytical Results For:*

ENERVEST
LEE GARDNER
2700 FARMINGTON BLD K SUITE #1
FARMINGTON NM, 87401
Fax To: NOT GIVEN

| | | | |
|---|---|---|---|
| Received: | 04/06/2011 | Sampling Date: | 04/05/2011 |
| Reported: | 04/08/2011 | Sampling Type: | Soil |
| Project Name: | SOIL SAMPLES | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location. | NOT GIVEN | | |

**Sample ID: 102 - 30 A (H100680-02)**

**BTEX 8021B** mg/kg **Analyzed By: CMS**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| Benzene* | <0.050 | 0.050 | 04/07/2011 | ND | 1.72 | 86.0 | 2.00 | 2.93 | |
| Toluene* | <0.050 | 0.050 | 04/07/2011 | ND | 1 79 | 89.6 | 2.00 | 2.27 | |
| **Ethylbenzene*** | **0.125** | 0.050 | 04/07/2011 | ND | 1.84 | 92.2 | 2.00 | 3.11 | |
| **Total Xylenes*** | **4.15** | 0.150 | 04/07/2011 | ND | 5.55 | 92.5 | 6.00 | 2 34 | |

*Surrogate 4-Bromofluorobenzene (PIL* *88 0 %* *70-130*

**Chloride, SM4500Cl-B** mg/kg **Analyzed By: HM**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| **Chloride** | **32.0** | 16.0 | 04/07/2011 | ND | 416 | 104 | 400 | 3.77 | |

**TPH 8015M** mg/kg **Analyzed By: AB** **S-04**

| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
|---|---|---|---|---|---|---|---|---|---|
| **GRO C6-C10** | **238** | 10.0 | 04/08/2011 | ND | 214 | 107 | 200 | 1.23 | |
| **DRO >C10-C28** | **859** | 10.0 | 04/08/2011 | ND | 204 | 102 | 200 | 6.06 | |

*Surrogate 1-Chlorooctane* *137 %* *70-130*

*Surrogate 1-Chlorooctadecane* *131 %* *70-130*

Cardinal Laboratories

*=Accredited Analyte



Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

## Notes and Definitions

| | |
|---|---|
| S-04 | The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect |
| ND | Analyte NOT DETECTED at or above the reporting limit |
| RPD | Relative Percent Difference |
| ** | Samples not received at proper temperature of 6°C or below |
| *** | Insufficient time to reach temperature. |
| - | Chloride by SM4500Cl-B does not require samples be received at or below 6°C |
| | Samples reported on an as received basis (wet) unless otherwise noted on report |





Celey D. Keene, Lab Director/Quality Manager

# CHAIN OF CUSTODY RECORD



Client: [illegible]

Contact LEE GARDNER

Address 2711 FARMINGTON

910 E FARMINGTON NM 87499

Phone Number 505-320-7524

FAX Number: LGARDNER@ENERGEST.NET

NOTES:

1) Ensure proper container packaging.

2) Ship samples promptly following collection.

3) Designate Sample Reject Disposition.

PO#

Project Name:

Samplers Signature

| Table 1. – Matrix Type |
|---|
| 1 = Surface Water, 2 = Ground Water |
| 3 = Soil/Sediment, 4 = Rinsate, 5 = Oil |
| 6 = Waste, 7 = Other (Specify) _____ |

FOR GAL USE ONLY

GAL JOB #

Lab Name Green Analytical Laboratories (970) 247-4220 FAX (970) 247-4227

Address 75 Suttle Street, Durango, CO 81303

| | Sample ID | Collection: Date | Collection: Time | Misc: Collected by. (Init.) | Misc: Matrix Type From Table 1 | Misc: No of Containers | Misc: Sample Filtered ? Y/N | Preservative(s): Unpreserved (Ice Only) | Preservative(s): HNO3 | Preservative(s): HCL | Preservative(s): H2SO4 | Preservative(s): NAOH | Preservative(s): Other (Specify) | Analyses Required: BTEX | Analyses Required: BENZENE | Analyses Required: CBM | Analyses Required: DRO | Analyses Required: CHLORIDES | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | H100680 | | | | | | | | | | | | | | | | | | |
| -1 | 1 LEC - 17 | 4/5/11 | 10 80 | LE | 3 | 1 | N | X | | | | | | X | X | X | X | X | |
| -2 | 2 108-30A | 4/5/11 | 2 18 | LG | 3 | 1 | N | X | | | | | | X | X | X | X | X | |
| | 3 | | | | | | | | | | | | | | | | | | |
| | 4 | | | | | | | | | | | | | | | | | | |
| | 5. | | | | | | | | | | | | | | | | | | |
| | 6 | | | | | | | | | | | | | | | | | | |
| | 7 | | | | | | | | | | | | | | | | | | |
| | 8. | | | | | | | | | | | | | | | | | | |
| | 9 | | | | | | | | | | | | | | | | | | |
| | 10. | | | | | | | | | | | | | | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Relinquished by | Date: 4/5/11 | Time: 14:42 | Received by: [signature] | Date: 4/5/11 | Time: 1442 |
| Relinquished by | Date: | Time | Received by: Gail Benson | Date: 4/6/11 | Time: 9:30 |

5°C #26

* Sample Reject. [ ] Return [ ] Dispose [ ] Store (30 Days)

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

April 07, 2011

LEE GARDNER

ENERVEST

2700 FARMINGTON BLD K SUITE #1

FARMINGTON, NM 87401

RE: SOIL SAMPLES

Enclosed are the results of analyses for samples received by the laboratory on 04/05/11 10:10.

Cardinal Laboratories is accredited through Texas NELAP for:

| | |
|---|---|
| Method SW-846 8021 | Benzene, Toluene, Ethyl Benzene, and Total Xylenes |
| Method SW-846 8260 | Benzene, Toluene, Ethyl Benzene, and Total Xylenes |
| Method TX 1005 | Total Petroleum Hydorcarbons |

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

| | |
|---|---|
| Method EPA 552.2 | Haloacetic Acids (HAA-5) |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V2, V3) |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager


JICARILLA CONT 146 019-DK
API# 3003920211
FEDERAL LEASE# JIC146
NE/4 NE/4 (A) S.4-T25N-R5W
Rio Arriba County (ELEV. 6,614)
ENERVEST OPERATING, LLC COMPANY
LAT 36.43325 LONG 107.35888