

District I
1625 N. French Dr., Hobbs, NM 88240

District II
1301 W. Grand Ave., Artesia, NM 88210

District III
1000 Rio Brazos Rd., 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.

**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: ConocoPhillips Company OGRID#: 217817
Address: PO Box 4289, Farmington, NM 87499
Facility or well name: SAN JUAN 28-7 UNIT 182N
API Number: 30-039-30635 OCD Permit Number: _____
U/L or Qtr/Qtr: J(NW/SE) Section: 3 Township 27N Range: 7W County: RIO ARRIBA
Center of Proposed Design: Latitude: 36.6005 °N Longitude: 107.55747 °W NAD: ☐ ### ☒ 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 (AIR Pre-set)
☐ 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 NOV 20 '13
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 ☐ PVD ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4
☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: _____ bbl Type of fluid: _____
Tank Construction material: _____
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner Type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

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.

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6

Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pit, 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 _____

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 of the Santa Fe Environmental Bureau office for consideration of approval. (Cavitation pit for Pre-set)

☐

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.

- 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 watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes

☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

(Applies to temporary, emergency, or cavitation pits and below-grade tanks)

- 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.

(Applied to permanent pits)

- 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.

- 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

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

☐ Yes

☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes

☐ No

Within the area overlying a subsurface mine.

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

☐ Yes

☐ No

Within an unstable area.

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

☐ Yes

☐ No

Within a 100-year floodplain

- FEMA map

☐ Yes

☐ No

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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
- ☐ 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 _____ or Permit _____

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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 _____

☐ Previously Approved Operating and Maintenance Plan API _____

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 H₂S, 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
☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

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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

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 identify 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: Envirotech / JFJ Landfarm % IEI Disposal Facility Permit #: NM-01-0011 / NM-01-0010B

Disposal Facility Name: Basin Disposal Facility Disposal Facility Permit #: NM-01-005

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

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

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

- ☐ Soil Backfill and Cover Design Specification - 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

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.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No

☐ N/A

Ground water is between 50 and 100 feet below the bottom of the buried waste

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No

☐ N/A

Ground water is more than 100 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No

☐ N/A

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; satellite image

☐ Yes ☐ No

☐ 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 the initial application.

- 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.

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

☐ Yes ☐ No

Within 500 feet of a wetland

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within the area overlying a subsurface mine.

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

☐ Yes ☐ No

Within an unstable area.

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

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

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

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Operator Application Certification:

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

Name (Print): _____ Title: _____
 Signature: _____ Date: _____
 e-mail address: _____ Telephone: _____

#

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

OCD Representative Signature: Donald D. Kelly Approval Date: 12/4/2013
 Title: Compliance Officer OCD Permit Number: _____

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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: _____ 4/16/2013

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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.

#

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

Instructions: Please identify 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

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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 (if applicable)
☐ 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

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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): Kenny Davis Title: Staff Regulatory Technician
 Signature: [Signature] Date: 11/14/2013
 e-mail address: kenny.r.davis@conocophillips.com Telephone: 505-599-4045

To: Jonathan Kelly (NMOCD)

RCVD NOV 27 '13
OIL CONS. DIV.
DIST. 3

Re: San Juan 28-7 Unit 182N

Preset Closure, Closure Report Correction

Jonathan, Please see the attached Closure report Summary top page that has been corrected to show the correct location and API # to amend the original report that was submitted on 11/18/13.

Thank You,

Keneuth Davis

ConocoPhillips Company

SJBU Regulatory Dept.

ConocoPhillips Company Cavitation Pit for Closed-Loop Locations

Design: San Juan 28-7 Unit 182N API# 30-039-30635

ConocoPhillips Company will use a cavitation pit plan when the surface casing will be pre-set on closed-loop locations. The drill cuttings will be stockpiled on the surface.

Operations and Maintenance:

The cavitation pit will be operated and maintained as follows:

1. Only Fresh water and air will be used in the drilling of the surface casing.
2. The Cement used will be: Neat Cement with no additives.
3. All of the fluids will be removed within 48hrs after drilling.
4. A representative five point composite sample will be taken of the drill cuttings, after the setting of the surface casing is complete, using sampling tools and all samples will be tested per Subsection B of 19.15.17.13(B)(1)(b). In the event that the testing criteria is not met, all contents will be dug and hauled per Subparagraph (a) of Paragraph (1) of Subsection B of 19.15.17.13 i.e.

Components	Tests Method	Limit (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	2500
GRO/DRO	EPA SW-846 8015M	500
Chlorides	EPA 300.1	500

5. The NMOCD will be notified via email of the test results of the cavitation surface as follows:

Components	Tests Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	ND
BTEX	EPA SW-846 8021B or 8260B	50	ND
TPH	EPA SW-846 418.1	2500	ND
GRO/DRO	EPA SW-846 8015M	500	34.3
Chlorides	EPA 300.1	500	ND

Closure Plan:

1. The NMOCD will be notified of the sample results and the intent to start the closure process 3-7 days prior to the drill cuttings being transported, moved, or distributed on location.
2. In the event the criteria are not met, all solids and liquids will be removed and disposed of at Envirotech (Permit #NM-01-0011) and/or Basin Disposal Facility (Permit #NM-01-005) and/or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B).
3. Testing results will be submitted with the Closure Report of the well locations Closed-Loop Permit on Form C-144.

ConocoPhillips is aware that approval of this plan does not relieve ConocoPhillips of liability should operations result in pollution of surface water, ground water, or the environment. Nor does approval relieve ConocoPhillips of its responsibility to comply with any other applicable governmental authority's rules and regulations.

ConocoPhillips Company

Cavitation Pit for Closed-Loop Locations

Design: MOORE COM LS 3P / 30-045-35207

ConocoPhillips Company will use a cavitation pit plan when the surface casing will be pre-set on closed-loop locations. The drill cuttings will be stockpiled on the surface.

Operations and Maintenance:

The cavitation pit will be operated and maintained as follows:

1. Only Fresh water and air will be used in the drilling of the surface casing.
2. The Cement used will be: Neat Cement with no additives.
3. All of the fluids will be removed within 48hrs after drilling.
4. A representative five point composite sample will be taken of the drill cuttings, after the setting of the surface casing is complete, using sampling tools and all samples will be tested per Subsection B of 19.15.17.13(B)(1)(b). In the event that the testing criteria is not met, all contents will be dug and hauled per Subparagraph (a) of Paragraph (1) of Subsection B of 19.15.17.13 i.e.

Components	Tests Method	Limit (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	2500
GRO/DRO	EPA SW-846 8015M	500
Chlorides	EPA 300.1	500

5. The NMOCD will be notified via email of the test results of the cavitation surface as follows:

Components	Tests Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	ND
BTEX	EPA SW-846 8021B or 8260B	50	ND
TPH	EPA SW-846 418.1	2500	ND
GRO/DRO	EPA SW-846 8015M	500	34.3
Chlorides	EPA 300.1	500	ND

Closure Plan:

1. The NMOCD will be notified of the sample results and the intent to start the closure process 3-7 days prior to the drill cuttings being transported, moved, or distributed on location.
2. In the event the criteria are not met, all solids and liquids will be removed and disposed of at Envirotech (Permit #NM-01-0011) and/or Basin Disposal Facility (Permit #NM-01-005) and/or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B).
3. Testing results will be submitted with the Closure Report of the well locations Closed-Loop Permit on Form C-144.

ConocoPhillips is aware that approval of this plan does not relieve ConocoPhillips of liability should operations result in pollution of surface water, ground water, or the environment. Nor does approval relieve ConocoPhillips of its responsibility to comply with any other applicable governmental authority's rules and regulations.



Analytical Report

Report Summary

Client: ConocoPhillips

Chain Of Custody Number: 6284

Samples Received: 4/16/2013 7:20:00AM

Job Number: 96052-1706

Work Order: P304046

Project Name/Location: San Juan 28-7 Unit #182
N

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Tim Cain', is written over a horizontal line.

Date: 4/17/13

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



ConocoPhillips
PO Box 2200
Bartlesville OK, 74005

Project Name: San Juan 28-7 Unit #182 N
Project Number: 96052-1706
Project Manager: Jamie L Goodwin

Reported:
17-Apr-13 12:51

Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Pre Set Cuttings	P304046-01A	Soil	04/15/13	04/16/13	Glass Jar, 4 oz.

Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.

5796 US Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865

Three Springs - 65 Mercado Street, Suite 115, Durango, CO 81301

Ph (970) 259-0615 Fr (800) 362-1879





ConocoPhillips
PO Box 2200
Bartlesville OK, 74005

Project Name: San Juan 28-7 Unit #182 N
Project Number: 96052-1706
Project Manager: Jamie L Goodwin

Reported:
17-Apr-13 12:51

Pre Set Cuttings
P304046-01 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Toluene	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Ethylbenzene	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
p,m-Xylene	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
o-Xylene	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Total BTEX	ND	49.9	ug/L	1	1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Surrogate: Bromochlorobenzene		93.8 %	80-120		1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Surrogate: 1,4-Difluorobenzene		93.0 %	80-120		1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Surrogate: Fluorobenzene		91.2 %	80-120		1316006	16-Apr-13	16-Apr-13	EPA 8021B	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	ND	5.00	mg/kg	1	1316007	16-Apr-13	17-Apr-13	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	5.00	mg/kg	1	1316007	16-Apr-13	17-Apr-13	EPA 8015D	
GRO and DRO Combined Fractions	ND	5.00	mg/kg	1	1316007	16-Apr-13	17-Apr-13	EPA 8015D	
Total Petroleum Hydrocarbons by 418.1									
Total Petroleum Hydrocarbons	ND	20.0	mg/kg	1	1316009	16-Apr-13	16-Apr-13	EPA 418.1	
Cation/Anion Analysis									
Chloride	ND	9.96	mg/kg	1	1316010	16-Apr-13	16-Apr-13	EPA 300.0	

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envirotech-inc.com
laboratory@envirotech-inc.com



ConocoPhillips
PO Box 2200
Bartlesville OK, 74005

Project Name: San Juan 28-7 Unit #182 N
Project Number: 96052-1706
Project Manager: Jamie L Goodwin

Reported:
17-Apr-13 12:51

Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1316006 - Purge and Trap EPA 5030A

Blank (1316006-BLK1)

Prepared & Analyzed: 16-Apr-13

Benzene	ND	49.9	ug/L							
Toluene	ND	49.9	"							
Ethylbenzene	ND	49.9	"							
p,m-Xylene	ND	49.9	"							
o-Xylene	ND	49.9	"							
Total BTEX	ND	49.9	"							
Surrogate: Bromochlorobenzene	47.5		"	50.0		95.1	80-120			
Surrogate: 1,4-Difluorobenzene	50.2		"	50.0		100	80-120			
Surrogate: Fluorobenzene	49.4		"	50.0		98.8	80-120			

Duplicate (1316006-DUP1)

Source: P304045-01

Prepared & Analyzed: 16-Apr-13

Benzene	ND	49.9	ug/L		ND				30	
Toluene	ND	49.9	"		ND				30	
Ethylbenzene	ND	49.9	"		ND				30	
p,m-Xylene	ND	49.9	"		ND				30	
o-Xylene	ND	49.9	"		ND				30	
Surrogate: Bromochlorobenzene	48.4		"	50.0		96.8	80-120			
Surrogate: 1,4-Difluorobenzene	48.4		"	50.0		96.9	80-120			
Surrogate: Fluorobenzene	47.5		"	50.0		95.1	80-120			

Matrix Spike (1316006-MS1)

Source: P304045-01

Prepared & Analyzed: 16-Apr-13

Benzene	2400	49.9	ug/L	2500	ND	96.0	39-150			
Toluene	2390	49.9	"	2500	ND	95.8	46-148			
Ethylbenzene	2370	49.9	"	2500	ND	94.9	32-160			
p,m-Xylene	4770	49.9	"	4990	ND	95.5	46-148			
o-Xylene	2400	49.9	"	2500	ND	96.0	46-148			
Surrogate: Bromochlorobenzene	47.2		"	50.0		94.4	80-120			
Surrogate: 1,4-Difluorobenzene	48.9		"	50.0		97.9	80-120			
Surrogate: Fluorobenzene	48.7		"	50.0		97.4	80-120			

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ConocoPhillips	Project Name:	San Juan 28-7 Unit #182 N	Reported: 17-Apr-13 12:51
PO Box 2200	Project Number:	96052-1706	
Bartlesville OK, 74005	Project Manager:	Jamie L Goodwin	

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1316007 - GRO/DRO Extraction EPA 3550C

Blank (1316007-BLK1)

Prepared & Analyzed: 16-Apr-13

Gasoline Range Organics (C6-C10)	ND	4.99	mg/kg
Diesel Range Organics (C10-C28)	ND	4.99	"
GRO and DRO Combined Fractions	ND	4.99	"

Duplicate (1316007-DUP1)

Source: P304045-01

Prepared & Analyzed: 16-Apr-13

Gasoline Range Organics (C6-C10)	ND	5.00	mg/kg	ND				30
Diesel Range Organics (C10-C28)	34.3	5.00	"	30.2			12.6	30

Matrix Spike (1316007-MS1)

Source: P304045-01

Prepared & Analyzed: 16-Apr-13

Gasoline Range Organics (C6-C10)	259	5.26	mg/kg	263	ND	98.4	75-125
Diesel Range Organics (C10-C28)	260	5.26	"	263	30.2	87.5	75-125

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ConocoPhillips	Project Name:	San Juan 28-7 Unit #182 N	Reported: 17-Apr-13 12:51
PO Box 2200	Project Number:	96052-1706	
Bartlesville OK, 74005	Project Manager:	Jamie L Goodwin	

Total Petroleum Hydrocarbons by 418.1 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1316009 - 418 Freon Extraction										
Blank (1316009-BLK1)					Prepared & Analyzed: 16-Apr-13					
Total Petroleum Hydrocarbons	ND	20.0	mg/kg							
Duplicate (1316009-DUP1)					Source: P304046-01 Prepared & Analyzed: 16-Apr-13					
Total Petroleum Hydrocarbons	ND	20.0	mg/kg		ND				30	
Matrix Spike (1316009-MS1)					Source: P304046-01 Prepared & Analyzed: 16-Apr-13					
Total Petroleum Hydrocarbons	1730	20.0	mg/kg	2000	ND	86.8	80-120			

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ConocoPhillips
PO Box 2200
Bartlesville OK, 74005

Project Name: San Juan 28-7 Unit #182 N
Project Number: 96052-1706
Project Manager: Jamie L Goodwin

Reported:
17-Apr-13 12:51

Cation/Anion Analysis - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1316010 - Anion Extraction EPA 300.0

Blank (1316010-BLK1)

Prepared & Analyzed: 16-Apr-13

Chloride	ND	9.96	mg/kg							
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Duplicate (1316010-DUP1)

Source: P304046-01

Prepared & Analyzed: 16-Apr-13

Chloride	ND	10.0	mg/kg		ND				30	
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ConocoPhillips
PO Box 2200
Bartlesville OK, 74005

Project Name: San Juan 28-7 Unit #182 N
Project Number: 96052-1706
Project Manager: Jamie L. Goodwin

Reported:
17-Apr-13 12:51

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

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CHAIN OF CUSTODY RECORD

6284

Page 9 of 9

Client: Conoco Phillips			Project Name / Location: San Juan 28-7 Unit #182N			ANALYSIS / PARAMETERS																
Client Address: 30th St / Regulatory Dept			Sampler Name: Tim Nobis			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact			
Client Phone No.: 505-326-9537			Client No.: WAN. CDR. 8114																			
Charge # 10235564 96052-1706																						
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative	HgO ₂	HCl	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact
Pre Set Cuttings	4/15/13	2:00 PM	P304046-01	Soil Sludge Solid Aqueous	ONE 4oz jar				X	X							X	X			X	X
				Soil Sludge Solid Aqueous																		
				Soil Sludge Solid Aqueous																		
				Soil Sludge Solid Aqueous																		
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Relinquished by: (Signature) <i>[Signature]</i> Tim Nobis			Date 4/15/13	Time 5:15 PM	Received by: (Signature) <i>[Signature]</i>			Date 4/16/13	Time 7:20													
Relinquished by: (Signature)					Received by: (Signature)																	
Relinquished by: (Signature)					Received by: (Signature)																	

RUSH Send Results to:
 jamie.l.goodwin@conocophillips.com
 326-9784

ENVIROTECH INC.
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