District 1
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

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.

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

	Closure of Modification	a pit, closed-loop system on to an existing perminant only submitted for a	em, below-grade tank t	or proposed alternative method, or proposed alternative method or non-permitted pit, closed-loop system,
Instructions: Ple	ease submit one application ((Form C-144) per individ	dual pit, closed-loop sys	stem, below-grade tank or alternative request
Please be advised that approv	al of this request does not relie	eve the operator of liability	should operations result	t in pollution of surface water, ground water or the governmental authority's rules, regulations or ordinances.
Operator: BP AMERICA	A PRODUCTION COME	PANY	OGRID#:7	778
Address: 200 Energy C	Court, Farmington, NM 8	7401		
Facility or well name: ST	ATE GAS COM J 001B			
· · · · · · · · · · · · · · · · · · ·		OCD	Permit Number:	
U/L or Qtr/Qtr B	Section 36.0	Township 30.0N	Range 09W	County: San Juan County
Center of Proposed Design	n: Latitude 36.77151	Lon	ngitude -107.72843	NAD: □1927 × 1983
	al 🗷 State 🗌 Private 🔲 Tri			
Temporary: Drilling Permanent Emerge Lined Unlined I String-Reinforced Liner Seams: Welded 3. Closed-loop System: Type of Operation: Perintent) Drying Pad Abov	Cavitation P&A Liner type: Thickness Factory Other Subsection H of 19.15.17.1 A Drilling a new well	I NMAC Workover or Drilling aul-off Bins Other mil LLDPE	Volume:bl	RCVD DEC 6 '13 OIL CONS. DIV. DIST. 3 Other x W x D hich require prior approval of a permit or notice of
Volume: 95.0 Tank Construction materia Secondary containmen Visible sidewalls and		Produced Water isible sidewalls, liner, 6-in	inch lift and automatic o	·

Form C-144

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, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify							
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)							
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC							
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 consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	office for						
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 acce, material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the approoffice or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	ppriate district approval.						
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 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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Acrial 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) - 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	☐ Ycs ☐ No						
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division							
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						

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 19.15.17.12 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: or Permi
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: (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
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 19.15.17.19 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Gil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Erosion Control Plan Erosion Control Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.19 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 Alternative 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 Fc Environmental Bureau for consideration)
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 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.) Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if 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 ser Yes (If yes, please provide the information below) No	vice and operations?
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 NMA 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	c 、
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 sou provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate disconsidered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	trict office or may be
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 ☐ NA
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
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
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
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; 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
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plants 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. 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 cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC	15.17.11 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): Jeffred Peace Signature: Date: 06/14/2010
e-mail address: Peace.Jeffrey@bp.com Telephone: _505-326-9479
20. 0 CD Approval: Permit Application (including closure plant) Closure Plan (only) OCD Conditions (see attachment)
Sept 1 (61/12/2013)
Title: Environmental Engineer 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:
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) \square 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 36,77/51 Longitude -/07.72843 NAD: 1927 1983
Operator Closure Certification:
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print): <u>Jeft Peace</u> Title: Field Environmental Advisor
Signature: Decomber 5, 2013
Signature: Date: Decomber 5, 2013 c-mail address: peace yellery & by. com Telephone: (505) 326-9479

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011
Submit 1 Copy to appropriate District Office in

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

			Rele	ase Notific	catio	n	and Co	rrective A	ction	1			
						(OPERAT	ΓOR		[Initia	al Report	\boxtimes	Final Report
Name of Co	mpany: B	P				C	Contact: Jef	f Peace					
		Court, Farmi	ngton, NI	M 87401		Т	elephone N	No.: 505-326-94	179				
Facility Nat	ne: State C	as Com J 11	3			F	acility Typ	e: Natural gas	well				
Surface Ow	ner: State			Mineral C)wner:	S	tate			API No	. 3004529	752	
				LOCA	ATIO	N	OF REI	EASE					
Unit Letter	Section	Township	Range	Feet from the			South Line	Feet from the	East/	West Line	County: S	an Juan	
В	36	30N	9W	1,180	North			2,190	East		County. 5		
		Lati	tude 36	5.77151			Longitude	e 107 72843					
		Eut					-						
Temp of Dalo				NAI	UKE) <u>(</u>	OF RELI	Release: N/A		Value I) J. ?	T/ A	
Type of Rele		v grade tank –	95 bbl			\dashv		lour of Occurrence	ce.		Recovered: I Hour of Dis		
Was Immedi			75 001			7	If YES, To		 	Date and	Tiour or Dis	covery.	
		_	Yes 🗌	No 🛛 Not R	equired	ı	,						
By Whom?							Date and H	lour					
Was a Water	course Read				-		If YES, Vo	lume Impacting	the Wat	ercourse.			
			Yes 🛛	No									
If a Watercon	urse was Im	pacted, Descr	be Fully.*			_		•			*		
Describe Co.	see of Probl	om and Reme	dial Action	Taken * Sampli	ng of th	ha	soil and wat	er beneath the Bo	GT was	done durin	ramoval to		no soil
								dards. Analysis i) chsure	110 5011
			•	•				, , , , , , , , , , , , , , , , , , ,					
Describe Are	2 Affected	and Cleanup A	Action Tak	en * RGT was re	moved	ar	nd the area u	nderneath the BC	T was	campled T	he evenyate	d area u	une
				by the raised co				nderneam the BC	JI Was	sampicu. i	ne excavate	a area w	/as
		,	.,		1		F						
L horoby cont	ify that the i	nformation ai	von obove	is true and comp	lata to	the	a boot of my	knowledge and u	un dorete	nd that num	went to NM	OCD =	ulog and
								nd perform correct					
								arked as "Final R					
								on that pose a thi					
				tance of a C-141	report of	do	es not reliev	e the operator of	respons	ibility for c	ompliance v	vith any	other
tederal, state	, or local lav	vs and/or regu	nations.				_	OIL CON	CEDY	LATION	DIVICIO) N.I.	
	1 /1	Ω						OIL CON	<u>SEK I</u>	ATION	DIVISIO	<u> </u>	
Signature:	Jeff	Veace											
5	9 ,					Α	approved by	Environmental S	Specialis	st:			
Printed Name	e: Jeff Peace	·	 -						—— _Т				
Title: Field E	Environment	al Advisor				Approval Date: Expira			Expiration	ion Date:			
E-mail Addre	ess: peace.je	ffrey@bp.coi	n			C	Conditions of	Approval:	Attached				
Date: Decen	nber 5, 201	3	Phon	e: 505-326-9479									

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, I P.O. BOX 87, BLOOMFIELD, N (505) 632-1199		API #:
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION /	OTHER:	PAGE#: 1 of 1
SITE INFORMATION	: SITE NAME: STATE GC J #1B		DATE STARTED: 06/27/13
QUAD/UNIT: B SEC: 36 TWP:	30N RNG: 9W PM: NM CNTY: S.	ST: NM	DATE FINISHED:
1/4 -1/4/FOOTAGE: 1,180'N / 2,190	E NW/NE LEASE TYPE: FEDERAL STAT		ENVIRONMENTAL
LEASE#: -	PROD. FORMATION: MV CONTRACTOR: MBF - P.	ALEXANDER	SPECIALIST(S): JCB
REFERENCE POINT	WELL HEAD (W.H.) GPS COORD.: 36.77	168 X 107.72819	GL ELEV.: 5,750'
	GPS COORD.: 36.77151 X 107.7284		ARING FROM W.H.: 94', S48W
2)	GPS COORD.:	DISTANCE/BE	ARING FROM W.H.:
3)	GPS COORD.:	DISTANCE/BE	ARING FROM W.H.:
4)	GPS COORD.:	DISTANCE/BE	ARING FROM W.H.:
SAMPLING DATA:	J	ALL	READING (ppm)
	SAMPLE DATE: 06/27/13 SAMPLE TIME: 1402		3015B/8021B/300.0(CI) 1.0
	SAMPLE DATE:SAMPLE TIME:		1
	SAMPLE DATE: SAMPLE TIME:		
	SAMPLE DATE:SAMPLE TIME:		
	SOIL TYPE: SAND SILTY SAND / SILTY CLAY	// CLAY / GRAVEL / OT	HER
SOIL COLOR: DARK YE COHESION (ALL OTHERS): NON COHESIVE / SLIGHTL		URLANTIO AND INC.	COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC
CONSISTENCY (NON COHESIVE SOILS): LO MOISTURE: DRY SLIGHTLY MOIST / WOIST / WO	OSE FIRM DENSE / VERY DENSE DENSITY (COHESING TO PTS. 5	E CLAYS & SILTS): SOFT	ANATION -
ANY AREAS DISPLAYING WETNESS: YES (NO	EXPLANATION - SERVED : YES / NO EXPLANATION		
	BSERVED AND/OR OCCURRED : YES / <u>NO]</u>		
			N.A.
	NA ft. XNA ft. XNA ft. EAREST WATER SOURCE: >1,000'_ NEAREST SURFACE WATE		TIMATION (Cubic Yards): NA CD TPH CLOSURE STD: 1,000 ppm
SITE SKETCH	PLOT PLAN	circle: attached 0VM	CALIB. READ. = 52.5 ppm RF = 0.52
	⊕ W.H.	↑ OVM	CALIB. GAS =
	•	N I TIME	
		' [MISCELL. NOTES
		Ϋ́	vo: N15274823
			O#:
			K: ZEVH01BGT2
		_	J#: Z2-00690-C ermit date(s): 06/14/10
X PBGTL		I -	CD Appr. date(s): 05/10/11
T.B. ~ 5' B.G.		Ta II	nk OVM = Organic Vapor Meter D ppm = parts per million
			BGT Sidewalls Visible: (Y) N
		X - S.P.D.	BGT Sidewalls Visible: Y / N
	ON DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPRC OW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAIN	NOTE TO LEGISLATION	BGT Sidewalls Visible: Y / N
APPLICABLE OR NOT AVAILABLE; SW - SINGL	OW-GRADE HANK LOCATION, SED - SAWIFLE FOINT DESIGNATION, R.W RETAIN EWALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	NO WALE, WATHOUT	Magnetic declination: 10 E
TRAVEL NOTES: CALLOUT:	ONSITE: 0	6/27/13	

Analytical Report

Lab Order 1307092

Date Reported: 7/9/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 95 BGT 5-pt@5'

Project: State GC J 1B

Collection Date: 6/27/2013 2:02:00 PM

Lab ID: 1307092-001

Matrix: SOIL

Received Date: 7/2/2013 10:00:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE	ORGANICS				Analyst	: JME
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	7/6/2013 12:05:21 AM	8208
Surr: DNOP	63.1	63-147	%REC	1	7/6/2013 12:05:21 AM	8208
EPA METHOD 8015D: GASOLINE RANG	GE				Analyst	: NSB
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	7/3/2013 6:00:54 PM	8205
Surr: BFB	90.7	80-120	%REC ^	1	7/3/2013 6:00:54 PM	8205
EPA METHOD 8021B: VOLATILES					Analyst	: NSB
Benzene	ND	0.047	mg/Kg	1	7/3/2013 6:00:54 PM	8205
Toluene	ND	0.047	mg/Kg	1	7/3/2013 6:00:54 PM	8205
Ethylbenzene	ND	0.047	mg/Kg	1	7/3/2013 6:00:54 PM	8205
Xylenes, Total	ND	0.095	mg/Kg	1	7/3/2013 6:00:54 PM	8205
Surr: 4-Bromofluorobenzene	99.7	80-120	%REC	1	7/3/2013 6:00:54 PM	8205
EPA METHOD 300.0: ANIONS					Analyst	: JRR
Chloride	ND	1.5	mg/Kg	1	7/5/2013 2:33:36 PM	8239
EPA METHOD 418.1: TPH					Analyst	: jmb
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	7/3/2013	8209

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit Page
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#: 1307092

09-Jul-13

Client:

Blagg Engineering

Project:

State GC J 1B

Sample ID: MB-8239

Prep Date: 7/5/2013

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 8239

RunNo: 11782

Analysis Date: 7/5/2013

ND

SeqNo: 334766

Units: mg/Kg

RPDLimit

Qual

Analyte Chloride

Result

PQL SPK value SPK Ref Val 1.5

%REC LowLimit

HighLimit

%RPD

Sample ID: LCS-8239

SampType: LCS

TestCode: EPA Method 300.0: Anions

Client ID: LCSS

Batch ID: 8239

RunNo: 11782

Prep Date: 7/5/2013

Analysis Date: 7/5/2013

SeqNo: 334767

Units: mg/Kg

Analyte

PQL Result

1.5

1.5

SPK value SPK Ref Val %REC LowLimit

HighLimit %RPD

Chloride

14

Result

Result

24

24

15.00

94.8

90

110

RPDLimit

Qual

Sample ID: 1307090-001AMS

SampType: MS

9.793

TestCode: EPA Method 300.0: Anions

SeqNo: 334769

Client ID: Prep Date:

BatchQC

Batch ID: 8239

RunNo: 11782

Units: mg/Kg

109

Analyte

7/5/2013

Analysis Date: 7/5/2013

SPK value SPK Ref Val **PQL**

%REC

LowLimit 58.8 HighLimit

RPDLimit

Qual

Qual

Chloride

Sample ID: 1307090-001AMSD

SampType: MSD

TestCode: EPA Method 300.0: Anions

RunNo: 11782

Client ID:

BatchQC Prep Date: 7/5/2013 Batch ID: 8239

15.00

15.00

SeqNo: 334770

Units: mg/Kg

%RPD

Analyte Chloride

Analysis Date: 7/5/2013 **PQL**

1.5

9.793

SPK value SPK Ref Val

%REC 93.5

LowLimit 58.8 HighLimit 109 %RPD 1.38

RPDLimit

20

Value exceeds Maximum Contaminant Level.

RPD outside accepted recovery limits

E Value above quantitation range

Analyte detected below quantitation limits 0 RSD is greater than RSDlimit

В Analyte detected in the associated Method Blank

Н Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit ND

Page 2 of 6

RLReporting Detection Limit

Qualifiers:

J

R

P Sample pH greater than 2 for VOA and TOC only.

Hall Environmental Analysis Laboratory, Inc.

WO#:

1307092

09-Jul-13

Client:

Blagg Engineering

Project:

State GC J 1B

Sample ID: MB-8209

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID: PBS

Batch ID: 8209 Analysis Date: 7/3/2013 RunNo: 11734

SeqNo: 333322

Units: mg/Kg

Qual

Analyte

Prep Date: 7/2/2013

Result

SPK value SPK Ref Val %REC LowLimit

HighLimit

%RPD **RPDLimit**

Petroleum Hydrocarbons, TR Sample ID: LCS-8209

ND

SampType: LCS

PQL

20

20

20

TestCode: EPA Method 418.1: TPH

Client ID: LCSS

Batch ID: 8209

RunNo: 11734

Prep Date: 7/2/2013

SeqNo: 333323

Units: mg/Kg

Analyte

Analysis Date: 7/3/2013

SPK value SPK Ref Val %REC

LowLimit

HighLimit 120 **RPDLimit**

Qual

Petroleum Hydrocarbons, TR

Result PQL 99

100.0

99.3

80

%RPD

Sample ID: LCSD-8209

Client ID: LCSS02

SampType: LCSD Batch ID: 8209

RunNo: 11734

TestCode: EPA Method 418.1: TPH

Units: mg/Kg

Prep Date: 7/2/2013

Analysis Date: 7/3/2013

SeqNo: 333324 %REC

0

LowLimit HighLimit

RPDLimit

Qual

Analyte Petroleum Hydrocarbons, TR

Result PQL

99

SPK value SPK Ref Val

100.0

99.3

80

120

%RPD 0

20

Qualifiers:

0

Value exceeds Maximum Contaminant Level.

E Value above quantitation range

ı Analyte detected below quantitation limits

RSD is greater than RSDlimit RPD outside accepted recovery limits В

Н Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Sample pH greater than 2 for VOA and TOC only. P

RL Reporting Detection Limit

Analyte detected in the associated Method Blank

Page 3 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1307092

09-Jul-13

Client:

Blagg Engineering

Project:

Analyte

State GC J 1B

Sample	ID:	MB-8208

SampType: MBLK

TestCode: EPA Method 8015D: Diesel Range Organics

LowLimit

Client ID: PBS

Batch ID: 8208

RunNo: 11753

HighLimit

Prep Date: 7/2/2013

Analysis Date: 7/5/2013

SeqNo: 334422

Units: mg/Kg

147

RPDLimit

Diesel Range Organics (DRO)

Result **PQL** ND

SPK value SPK Ref Val %REC

Surr: DNOP

8.6

10.00

50.00

5.000

49.80

4.980

86.0

TestCode: EPA Method 8015D: Diesel Range Organics

63

77.1

63

%RPD

Sample ID: LCS-8208

SampType: LCS Client ID: LCSS

Batch ID: 8208

RunNo: 11753

Prep Date: 7/2/2013

Analysis Date: 7/5/2013

PQL

SeqNo: 334423

Units: mg/Kg

128

147

%RPD

Qual

Diesel Range Organics (DRO) Surr: DNOP

56 10 3.6

51

4.5

Result

SPK value SPK Ref Val %REC LowLimit 112

HighLimit

RPDLimit

Sample ID: 1307018-001AMS

SampType: MS

73.0

TestCode: EPA Method 8015D: Diesel Range Organics

Client ID: BatchQC Prep Date: 7/2/2013

Batch ID: 8208

RunNo: 11753 SeqNo: 334424

102

89.7

Units: mg/Kg

Analyte

Analysis Date: 7/5/2013 Result **PQL**

10

SPK value SPK Ref Val %REC

LowLimit 61.3

63

HighLimit %RPD

138

147

RPDLimit

Qual

Qual

Diesel Range Organics (DRO) Surr: DNOP

SampType: MSD

TestCode: EPA Method 8015D: Diesel Range Organics

Client ID: BatchQC

Sample ID: 1307018-001AMSD

Batch ID: 8208

RunNo: 11753

Prep Date: 7/2/2013

Analysis Date: 7/5/2013

SeqNo: 334425

Units: mg/Kg

Analyte

Result **PQL**

SPK value SPK Ref Val %REC

LowLimit

HighLimit

%RPD **RPDLimit** 15.1

20

0

Diesel Range Organics (DRO) Surr: DNOP

59 10 4.5

50.00 5.000

118 90.1

61.3 63 138 147

0

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range
- Analyte detected below quantitation limits

RPD outside accepted recovery limits

- RSD is greater than RSDlimit O
- В Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- Sample pH greater than 2 for VOA and TOC only.
- RLReporting Detection Limit

Page 4 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1307092

09-Jul-13

Client:

Blagg Engineering

Project:

State GC J 1B

Sample ID: MB-8205

SampType: MBLK

Result

930

Result

Result

26

960

24

990

TestCode: EPA Method 8015D: Gasoline Range

Client ID:

PBS

Batch ID: 8205

PQL

RunNo: 11743

80

LowLimit

LowLimit

62.6

80

76

80

LowLimit

76

80

Prep Date: 7/2/2013

Analysis Date: 7/3/2013

SeqNo: 333662

%REC

Units: mg/Kg HighLimit

RPDLimit Qual

Gasoline Range Organics (GRO)

Analyte

ND 5.0

1000

SPK value SPK Ref Val

SPK value SPK Ref Val

25.00

1000

23.63

945.2

23.61

944.3

92.6

120

Surr: BFB

Sample ID: LCS-8205

SampType: LCS

%REC

95.8

99.0

TestCode: EPA Method 8015D: Gasoline Range

%RPD

%RPD

%RPD

Client ID: LCSS

Batch ID: 8205

RunNo: 11743

HighLimit

136

120

Prep Date:

Surr: BFB

7/2/2013

Analysis Date: 7/3/2013

PQL

5.0

SeqNo: 333663

Units: mg/Kg

RPDLimit Qual

Qual

Sample ID: 1307031-001AMS

Gasoline Range Organics (GRO)

SampType: MS

TestCode: EPA Method 8015D: Gasoline Range

Client ID: BatchQC

Batch ID: 8205

RunNo: 11743

Prep Date: 7/2/2013

Analysis Date: 7/3/2013

SeqNo: 333665

110

102

Units: mg/Kg

156

120

Analyte

Sample ID: 1307031-001AMSD

PQL

4.7

4.7

SPK value SPK Ref Val %REC LowLimit

O

HighLimit

0

RPDLimit Qual

Gasoline Range Organics (GRO) Surr: BFB

SampType: MSD

TestCode: EPA Method 8015D: Gasoline Range

Client ID: Prep Date: 7/2/2013

BatchQC

Batch ID: 8205

RunNo: 11743

120

Analyte Gasoline Range Organics (GRO)

Surr: BFB

Analysis Date: 7/3/2013 SPK value SPK Ref Val Result PQL

26

940

SeqNo: 333666 %REC

112

100

Units: mg/Kg

RPDLimit %RPD HighLimit 156 1.96 17.7 0

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range
- Analyte detected below quantitation limits
- RSD is greater than RSDlimit 0 RPD outside accepted recovery limits

- Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- Sample pH greater than 2 for VOA and TOC only.
- Reporting Detection Limit

Page 5 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1307092

09-Jul-13

L	П	e	n	ι	•	

Blagg Engineering

Project:

State GC J 1B

Sample ID: MB-8205	SampType: MBLK		TestCode: EPA Method 8021B: Volatiles						,	
Client ID: PBS	Batc	Batch ID: 8205		F	1743					
Prep Date: 7/2/2013	Analysis D	Date: 7/	3/2013	\$	SeqNo: 3	33690	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050							· · · · · · · · · · · · · · · · · · ·	
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			

Sample ID: LCS-8205	Sampi	Гуре: LC	:S	Tes	tCode: El	PA Method	8021B: Vola	tiles								
Client ID: LCSS	Batc	h ID: 82 6	05	F	RunNo: 1	1743										
Prep Date: 7/2/2013	Analysis Date: 7/3/2013			5	SeqNo: 333691 Units: mg/Kg											
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual						
Benzene	0.95	0.050	1.000	0	95.2	80	120									
Toluene	0.93	0.050	1.000	0	93.2	80	120									
Ethylbenzene	. 0.94	0.050	1.000	0	93.8	80	120									
Xylenes, Total	2.9	0.10	3.000	0	95.8	80	120									
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120									

Sample ID: 1307082-001AMS	MS SampType: MS TestCode: EPA Method 8021B: Volatiles									
Client ID: BatchQC	Batc	h ID: 82 6	05	F	RunNo: 1	1743				
Prep Date: 7/2/2013	Analysis [Date: 7/	3/2013	SeqNo: 333693 Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit_	Qual
Benzene	0.87	0.048	0.9615	0.01757	88.7	67.3	145			
Toluene	0.88	0.048	0.9615	0.01709	90.0	66.8	144			
Ethylbenzene	0.91	0.048	0.9615	0	94.4	61.9	153			
Xylenes, Total	2.9	0.096	2.885	0.02460	98.2	65.8	149			
Surr: 4-Bromofluorobenzene	1.0		0.9615		106	80	120			

Sample ID: 1307082-001AM	Tes	tCode: El	PA Method	8021B: Volat	iles					
Client ID: BatchQC	Batch	n ID: 82 0	05	F	RunNo: 1	1743				
Prep Date: 7/2/2013	Analysis D	ate: 7/	3/2013	5	SeqNo: 3	33694	Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.97	0.048	0.9615	0.01757	98.8	67.3	145	10.5	20) == 0
Toluene	0.98	0.048	0.9615	0.01709	99.8	66.8	144	10.2	20	
Ethylbenzene	0.99	0.048	0.9615	0	103	61.9	153	8.56	20	
Xylenes, Total	3.1	0.096	2.885	0.02460	106	65.8	149	7.73	20	
Surr: 4-Bromofluorobenzene	1.0		0.9615		107	80	120	0	0	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

Page 6 of 6

C	hain-	of-Cu	stody Record	Turn-Around	Time:] •		2.4				يو سي		.		m. 0 m		817	-AI	
Client:	BLAGE	= ENGI	NEERWE INC.	 ∡Standard	□ Rush	1				H											TAL OR	
	ZP	A MER.	· A	Project Name						9												. •
BP AMERICA Mailing Address: P.O. Box 87		STATE GC J 1B					49	01 H	awki		'.hali E -						109					
	Brown	FIELD	NM 87413	Project #:				1			5-34				•	-		410				
			3z- 1199	1				; za , ' or'	, ,	ر و در		1-0-4	Â	naly	sis l	Req	uest	7 · 1210			e e	and some
email o				Project Mana	iger:			<u></u>	(yl	ହ					(†)							
QA/QC Package: ✓Standard □ Level 4 (Full Validation)			J.	BLAGG			## ES (8021)	(Gas or	##/ OS			SIMS)		PO4,SC	PCB's					:		
Accreditation □ NELAP □ Other			J-BLAGG Sampler: J-BAGG Onice Samples			SIME I	+ ТРН	RO / DE	18.1)				3,NO ₂ ,	/ 8082		(Y	1			S Z		
□ EDD	(Type)_			Sample Tem	perature:	900	NATE OF		BE.	9	Д 4	Q 2	ō	tals	<u>X</u> ,	ides	2	Ο.	W			ځ
Date	Time	Matrix	Sample Request ID		Preservative Type		AL New	BTEX +-MEER	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO /加配)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270	RCRA 8 Metals	Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	CHOSE	1	1	Air Bubbles (Y or N)
27/2013	1402	SOIL	95 BGT 5-Pt@5	403×1	COOL		001	X		$\neg \neg$	X	\sqcap							X			
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			-								Ì									一	一	
	<u> </u>											1	_							寸	\top	\top
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																				\Box	\exists	\top
Date:	1057	Relinquishe	Begg	Received by: Mustine L	heten	7/2013		Rem	narks		Bil PAI			⊋.	ΕV	HE)1E	3GT				
Date:	Time:	Relinquishe	tw Waller	Received by:	07	Date	Time 5 1000				1 777 CDN								. —			
		samples subm	titled to Hall Environmental may be subc	ontracted to other a	credited laboratorie	es. This serve	s as notice of this	possib	oility. A										nalytica	ıl repoi	rt.	

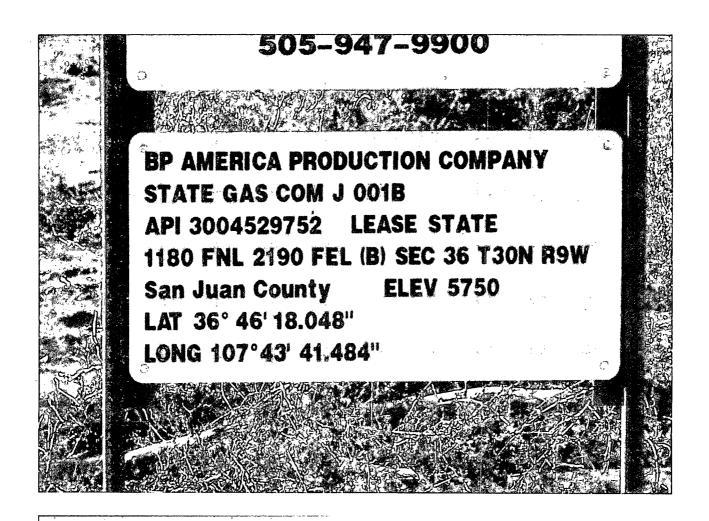


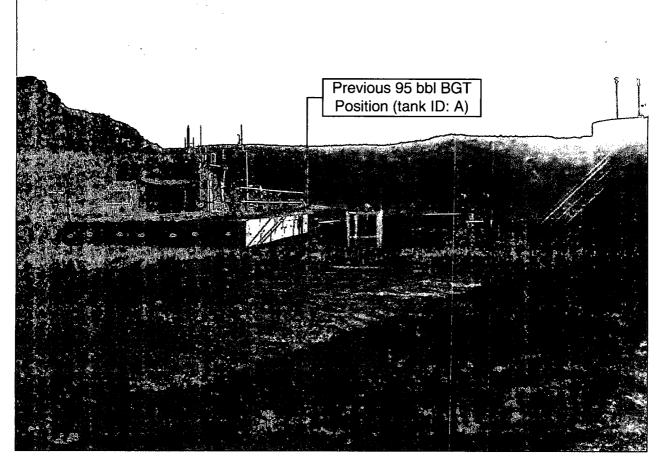
Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: BLAGG	Work Order Number:	1307092	_	RcptNo:	1
Received by/date:	07/09/13				
Logged By: Ashley Gallegos	7/2/2013 10:00:00 AM	`	A		
Completed By: Ashley Gallegos	7/2/2013 10:47:57 AM		A		
Reviewed By:	07/02/13		U		
Chain of Custody					
1. Custody seals intact on sample bottles?		Yes 🗌	No 🗌	Not Present	
2. Is Chain of Custody complete?		Yes 🗹	No 🗌	Not Present	
3. How was the sample delivered?		Courier			
<u>Log in</u>					
4. Was an attempt made to cool the samples?		Yes 🗹	No 🗆	NA \square	
5. Were all samples received at a temperature of	of >0° C to 6.0°C	Yes 🗹	No 🗆	NA 🗌	
6. Sample(s) in proper container(s)?	• •	Yes 🗹	No 🗆		
7. Sufficient sample volume for indicated test(s)	?	Yes 🗹	No 🗌		
8. Are samples (except VOA and ONG) properly	preserved?	Yes 🗹	No 🗌		
9. Was preservative added to bottles?		Yes 🗌	No 🗹	NA \square	
10.VOA vials have zero headspace?		Yes 🗌	No 🗆	No VOA Vials	•
11. Were any sample containers received broker	?	Yes	No 🗹	# of preserved	-
10.5		🖼		bottles checked	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)		Yes 🗹	No 🗆	for pH: (<2 o	r >12 unless noted)
13. Are matrices correctly identified on Chain of C	Custody?	Yes 🗹	No 🗆	Adjusted?	
14. Is it clear what analyses were requested?	•	Yes 🔽	No 🗆		
15. Were all holding times able to be met? (If no, notify customer for authorization.)		Yes 🗹	No 🗌	Checked by:	
Special Handling (if applicable)		_	_		
16. Was client notified of all discrepancies with th	is order?	Yes 🗌	No 🗆	NA 🗹	1
Person Notified:	Date:				
By Whom:	Via:	_ eMail _	Phone Fax	In Person	
Regarding: Client Instructions:					
17. Additional remarks:	<u> </u>			<u> </u>	j
18. Cooler Information					
	al Intact Seal No S	eal Date	Signed By		
1 2.6 Good Yes					





BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

State Gas Com J 1B API No. 3004529752 Unit Letter B, Section 36, T30N, R9W RCVD DEC 6'13
OIL CONS. DIV.
DIST. 3

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
 - No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT replaced with LPT, but realizes notice is required for any BGT closure. Closure notices will be made for all BGT closures from this point forward.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location 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.

No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT replaced with LPT, but realizes notice is required for any BGT closure. Closure notices will be made for all BGT closures from this point forward.

- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP 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. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT was removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

The BGT was transported to a storage area for sale and re-use.

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

All equipment associated with the BGT has been removed.

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method	Release Verification	Sample
		(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results indicated no release occurred.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

The area under the BGT was backfilled with clean soil. It is still within the active area and is partially covered by the raised compressor pad.

10. BP 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. BP 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 Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

The area under the BGT is partially covered by the raised compressor pad. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. 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.

The area under the BGT is partially covered by the raised compressor pad. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area under the BGT is partially covered by the raised compressor pad. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

BP will seed the area when the well is plugged and abandoned.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation.

 Closure report on C-144 form is included.
- 16. BP 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.

Certification section of C-144 has been completed.