

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: Burlington Resources Oil & Gas Company, LP OGRID#: 14538  
Address: P.O. Box 4289, Farmington, NM 87499  
Facility or well name: CULPEPPER MARTIN 11C  
API Number: 30-045-30553 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr: O(SW/SE) Section: 29 Township: 32N Range: 12W County: San Juan  
Center of Proposed Design: Latitude: 36.95298 °N Longitude: -108.11552 °W 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 DIST. 3  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimension L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

RCVD DEC 31 '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: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Metal  
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner Type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☒ Other UNSPECIFIED

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.

P

35

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

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**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. (**Fencing/BGT Liner**)

☐

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

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**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
- ☐ 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 \_\_\_\_\_

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design: based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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**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: \_\_\_\_\_ Disposal Facility Permit #: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit #: \_\_\_\_\_

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

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

☐ Yes ☐ No

**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: \_\_\_\_\_

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

OCD Representative Signature: Jonathan D. Kelly Approval Date: 1/10/2014  
 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: February 27, 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.

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**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: \_\_\_\_\_ °N Longitude: \_\_\_\_\_ °W 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): DENISE JOURNEY Title: REGULATORY TECHNICIAN  
 Signature: Denise Journey Date: 12/30/2013  
 e-mail address: Denise.Journey@conocophillips.com Telephone: 505-326-9556

**Burlington Resources Oil Gas Company, LP**  
**San Juan Basin**  
**Below Grade Tank Closure Report**

**Lease Name: CULPEPPER MARTIN 11C**

**API No.: 30-045-30553**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**
3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

**All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.**

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

**The below-grade tank was disposed of in a division-approved manner.**

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

**All on-site equipment associated with the below-grade tank was removed.**

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.
7. **A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.**

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

**A release was not determined for the above referenced well.**

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

**The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.**

10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
- Operator's name
  - Location by Unit Letter, Section, Township, and Range. Well name and API number.

**Notification is attached.**

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

**The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)**

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

**The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.**

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

**Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.**

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

**The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.**

15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
- Soil Backfilling and Cover Installation **(See Report)**
  - Re-vegetation application rates and seeding techniques **(See Report)**
  - Photo documentation of the site reclamation **(Included as an attachment)**
  - Confirmation Sampling Results **(Included as an attachment)**
  - Proof of closure notice **(Included as an attachment)**



Animas Environmental Services, LLC

[www.animasenvironmental.com](http://www.animasenvironmental.com)

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3084

April 17, 2013

Crystal Tafoya  
ConocoPhillips  
San Juan Business Unit  
Office 214-05  
5525 Hwy 64  
Farmington, New Mexico 87401

**RE: Below Grade Tank Closure Report  
Culpepper Martin #11C  
San Juan County, New Mexico**

Dear Ms. Tafoya:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Culpepper Martin #11C, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

---

## 1.0 Site Information

### 1.1 Location

Site Name – Culpepper Martin #11C

Legal Description – SW¼ SE¼, Section 29, T32N, R12W, San Juan County, New Mexico

Well Latitude/Longitude – N36.95314 and W108.11622, respectively

BGT Latitude/Longitude – N36.95307 and W108.11593, respectively

Land Jurisdiction – Private

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, March 2013

### 1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a C-144 form dated February 2013 for the Culpepper Martin #11C reported the depth to groundwater as less than 50 feet below ground surface (bgs). The New Mexico Office of the State Engineer (NMOSE) database was reviewed for nearby water wells, and no registered water wells were reported to be located within 1,000 feet of the location. Additionally, Google Earth and the New Mexico Tech Petroleum

Recovery Research Center online mapping tool (<http://ford.nmt.edu/react/project.html>) were accessed to aid in the identification of downgradient surface water.

Once on site, AES personnel further assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was less than 50 feet bgs. An unnamed wash which discharges to McDermott Arroyo is located approximately 150 feet southeast of the location. Based on this information, the location was assessed a ranking score of 40.

### **1.3 BGT Closure Assessment**

AES was initially contacted by Jess Henson, CoP representative, on March 12, 2013, and on March 13, 2013, Kelsey Christiansen and Anna Riling of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

---

## **2.0 Soil Sampling**

On March 13, 2013, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

### **2.1 Field Screening**

#### **2.1.1 Volatile Organic Compounds**

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

#### **2.1.2 Total Petroleum Hydrocarbons**

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

### 2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

## 2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8260B; and
- Chloride per USEPA Method 300.0.

## 2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 0.1 ppm in S-1 up to 0.7 ppm in S-5. Field TPH concentrations ranged from 23.5 mg/kg in S-3 up to 47.6 mg/kg in S-1. The field chloride concentration in SC-1 was 60 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results  
Culpepper Martin #11C BGT Closure, March 2013

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
<b>NMOCD Action Level (NMAC 19.15.17.13E)</b>			<b>--</b>	<b>100</b>	<b>250</b>
S-1	03/13/13	0.5	0.1	47.6	NA
S-2	03/13/13	0.5	0.2	27.5	NA
S-3	03/13/13	0.5	0.3	23.5	NA
S-4	03/13/13	0.5	0.3	35.5	NA
S-5	03/13/13	0.5	0.7	27.5	NA
SC-1	03/13/13	0.5	NA	NA	60

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.050 mg/kg and 0.25 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Table 2. Soil Laboratory Analytical Results  
Culpepper Martin #11C BGT Closure, March 2013

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action Level (NMAC 19.15.17.13E)			0.2	50	100		250
SC-1	03/13/13	0.5	<0.050	<0.25	NA	NA	<30

NA - not analyzed

### 3.0 Conclusions and Recommendations

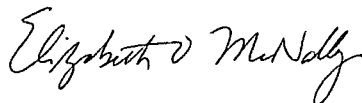
NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentration reported in S-1 with 47.6 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the Culpepper Martin #11C.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,



Kelsey Christiansen  
Environmental Scientist

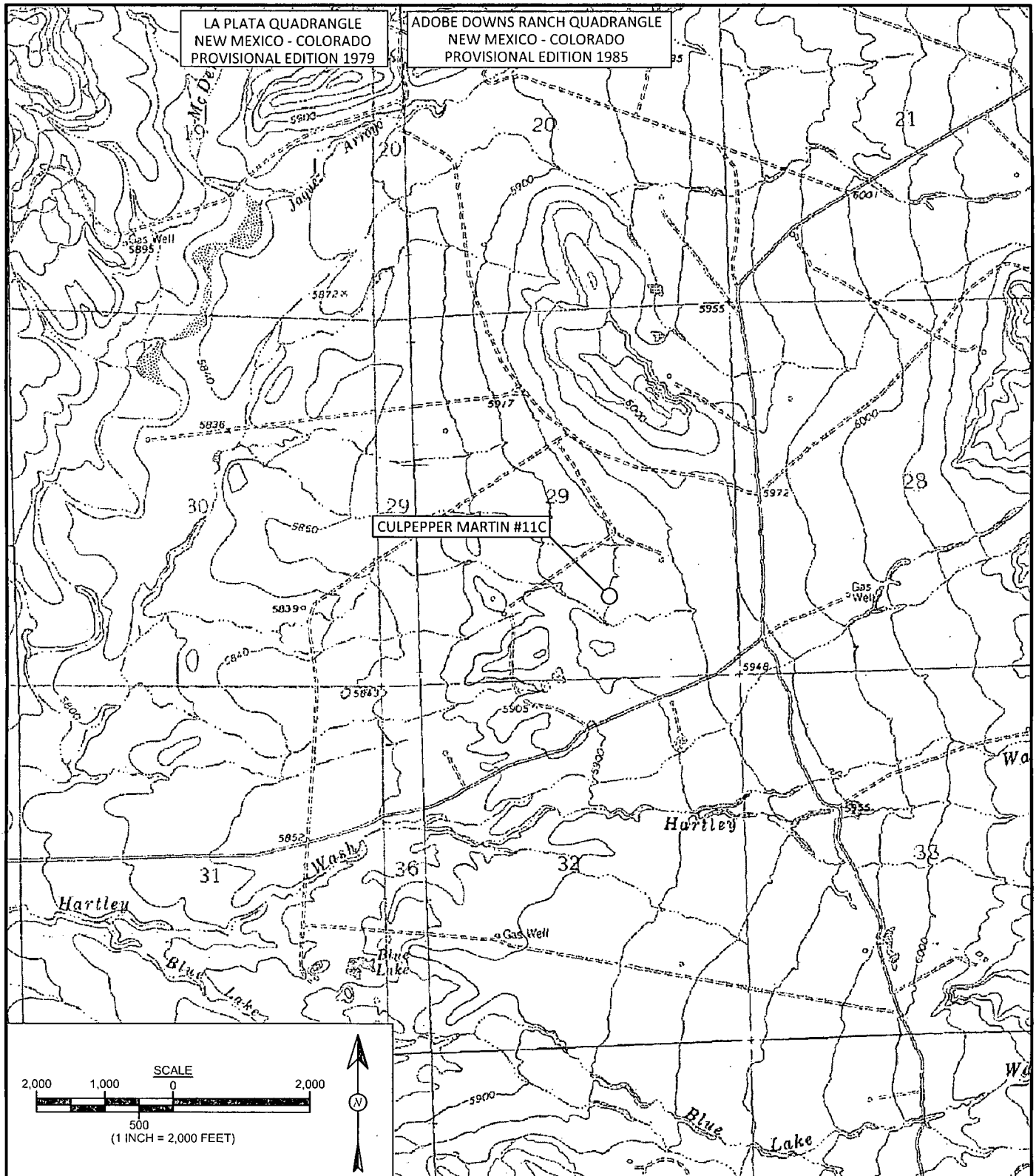


Elizabeth McNally, P.E.

**Attachments:**

**Figure 1. Topographic Site Location Map**  
**Figure 2. Aerial Site Map, March 2013**  
**AES Field Screening Report 031313**  
**Hall Analytical Report 1303550**

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\Culpepper Martin #11C\Culpepper Martin #11C  
BGT Closure Report 041713.docx



**FIGURE 1**

**TOPOGRAPHIC SITE LOCATION MAP**

ConocoPhillips  
CULPEPPER MARTIN #11C  
SW¼ SE¼, SECTION 29, T32N, R12W  
SAN JUAN COUNTY, NEW MEXICO  
N36.95314, W108.11622



Animas Environmental Services, LLC

**DRAWN BY:**  
K. Christiansen

**DATE DRAWN:**  
April 3, 2013

**REVISIONS BY:**  
K. Christiansen

**DATE REVISED:**  
April 3, 2013

**CHECKED BY:**  
D. Watson

**DATE CHECKED:**  
April 3, 2013

**APPROVED BY:**  
E. McNally

**DATE APPROVED:**  
April 3, 2013

LEGEND

⊙ SAMPLE LOCATIONS

Field Screening Results

Sample ID	Date	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		--	100	250
S-1	3/13/13	0.1	47.6	NA
S-2	3/13/13	0.2	27.5	NA
S-3	3/13/13	0.3	23.5	NA
S-4	3/13/13	0.3	35.5	NA
S-5	3/13/13	0.7	27.5	NA
SC-1	3/13/13	NA	NA	60

SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5. NA - NOT ANALYZED

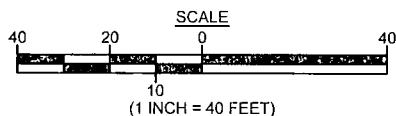
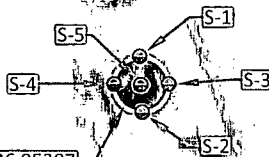
Laboratory Analytical Results

Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		0.2	50	100		250
SC-1	3/13/13	<0.050	<0.25	NA	NA	<30

SAMPLE WAS ANALYZED PER EPA METHOD 8260B AND 300.0. NA- NOT ANALYZED

CULPEPPER MARTIN #11C  
WELL HEAD

BGT - N36.95307  
W108.11593



AERIAL SOURCE: © 2012 MICROSOFT CORPORATION - AVAILABLE EXCLUSIVELY BY DIGITALGLOBE



Animas Environmental Services, LLC

DRAWN BY:  
K. Christiansen

DATE DRAWN:  
April 3, 2013

REVISIONS BY:  
K. Christiansen

DATE REVISED:  
April 3, 2013

CHECKED BY:  
D. Watson

DATE CHECKED:  
April 13, 2013

APPROVED BY:  
E. McNally

DATE APPROVED:  
April 13, 2013

FIGURE 2

AERIAL SITE MAP  
BELOW GRADE TANK CLOSURE  
MARCH 2013  
ConocoPhillips  
CULPEPPER MARTIN #11C  
SW¼, SE¼, SECTION 29, T32N, R12W  
SAN JUAN COUNTY, NEW MEXICO  
N36.95314, W108.11593

# AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3084

Client: ConocoPhillips

Project Location: Culpepper Martin #11C

Date: 3/13/2013

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Location	OVM (ppm)	Field Chloride (mg/kg)	Field TPH Analysis Time	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-1	3/13/2013	10:18	North	0.1	NA	11:28	47.6	20.0	1	KC
S-2	3/13/2013	10:20	South	0.2	NA	11:31	27.5	20.0	1	KC
S-3	3/13/2013	10:21	East	0.3	NA	11:36	23.5	20.0	1	KC
S-4	3/13/2013	10:23	West	0.3	NA	11:39	35.5	20.0	1	KC
S-5	3/13/2013	10:25	Center	0.7	NA	11:42	27.5	20.0	1	KC
SC-1	3/13/2013	10:38	Composite	NA	60	Not Analyzed for TPH.				

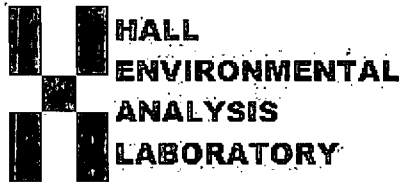
PQL Practical Quantitation Limit  
ND Not Detected at the Reporting Limit  
NA Not Analyzed  
DF Dilution Factor

\*Field TPH concentrations recorded may be below PQL.

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with Silver Nitrate

Total Petroleum Hydrocarbons - USEPA 418.1

Analyst:



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)

March 19, 2013

Debbie Watson  
Animas Environmental Services  
624 East Comanche  
Farmington, NM 87401  
TEL: (505) 486-4071  
FAX:

RE: CoP Culpepper Martin #11C

OrderNo.: 1303550

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 3/14/2013 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman".

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Analytical Report**

Lab Order 1303550

Date Reported: 3/19/2013

**Hall Environmental Analysis Laboratory, Inc.****CLIENT:** Animas Environmental Services**Client Sample ID:** SC-1**Project:** CoP Culpepper Martin #11C**Collection Date:** 3/13/2013 11:17:00 AM**Lab ID:** 1303550-001**Matrix:** MEOH (SOIL)**Received Date:** 3/14/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: JRR
Chloride	ND	30		mg/Kg	20	3/14/2013 11:20:49 AM
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>						Analyst: RAA
Benzene	ND	0.050		mg/Kg	1	3/14/2013 1:40:01 PM
Toluene	ND	0.050		mg/Kg	1	3/14/2013 1:40:01 PM
Ethylbenzene	ND	0.050		mg/Kg	1	3/14/2013 1:40:01 PM
Xylenes, Total	ND	0.10		mg/Kg	1	3/14/2013 1:40:01 PM
Surr: 1,2-Dichloroethane-d4	91.0	70-130		%REC	1	3/14/2013 1:40:01 PM
Surr: 4-Bromofluorobenzene	91.9	70-130		%REC	1	3/14/2013 1:40:01 PM
Surr: Dibromofluoromethane	95.5	70-130		%REC	1	3/14/2013 1:40:01 PM
Surr: Toluene-d8	97.2	70-130		%REC	1	3/14/2013 1:40:01 PM

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1303550

19-Mar-13

Client: Animas Environmental Services

Project: CoP Culpepper Martin #11C

Sample ID: MB-6485	SampType: MBLK	TestCode: EPA Method 300.0: Anions								
Client ID: PBS	Batch ID: 6485	RunNo: 9186								
Prep Date: 3/14/2013	Analysis Date: 3/14/2013	SeqNo: 261163			Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: LCS-6485	SampType: LCS	TestCode: EPA Method 300.0: Anions								
Client ID: LCSS	Batch ID: 6485	RunNo: 9186								
Prep Date: 3/14/2013	Analysis Date: 3/14/2013	SeqNo: 261164			Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.1	90	110			

## Qualifiers:

- |  |  |
|--|--|
| * Value exceeds Maximum Contaminant Level.   | B Analyte detected in the associated Method Blank    |
| E Value above quantitation range             | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit               |
| P Sample pH greater than 2                   | R RPD outside accepted recovery limits               |
| RL Reporting Detection Limit                 | S Spike Recovery outside accepted recovery limits    |

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1303550

19-Mar-13

Client: Animas Environmental Services

Project: CoP Culpepper Martin #11C

Sample ID: <b>mb-6438</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 8260B: Volatiles Short List</b>								
Client ID: <b>PBS</b>	Batch ID: <b>R9181</b>	RunNo: <b>9181</b>								
Prep Date: <b>3/12/2013</b>	Analysis Date: <b>3/14/2013</b>	SeqNo: <b>261823</b>	Units: <b>mg/Kg</b>							
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: 1,2-Dichloroethane-d4	0.43		0.5000		86.3	70	130			
Surr: 4-Bromofluorobenzene	0.45		0.5000		90.3	70	130			
Surr: Dibromofluoromethane	0.47		0.5000		93.1	70	130			
Surr: Toluene-d8	0.51		0.5000		101	70	130			

Sample ID: <b>lcs-6438</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 8260B: Volatiles Short List</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>R9181</b>	RunNo: <b>9181</b>								
Prep Date: <b>3/12/2013</b>	Analysis Date: <b>3/14/2013</b>	SeqNo: <b>261824</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.050	1.000	0	96.3	70	130			
Toluene	1.0	0.050	1.000	0	101	80	120			
Surr: 1,2-Dichloroethane-d4	0.45		0.5000		89.7	70	130			
Surr: 4-Bromofluorobenzene	0.45		0.5000		89.4	70	130			
Surr: Dibromofluoromethane	0.46		0.5000		92.2	70	130			
Surr: Toluene-d8	0.51		0.5000		101	70	130			

Sample ID: <b>1303550-001a ms</b>	SampType: <b>MS</b>	TestCode: <b>EPA Method 8260B: Volatiles Short List</b>								
Client ID: <b>SC-1</b>	Batch ID: <b>R9181</b>	RunNo: <b>9181</b>								
Prep Date:	Analysis Date: <b>3/14/2013</b>	SeqNo: <b>261830</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.68	0.050	0.6661	0	103	67.5	124			
Toluene	0.71	0.050	0.6661	0	107	55.8	142			
Surr: 1,2-Dichloroethane-d4	0.30		0.3330		90.7	70	130			
Surr: 4-Bromofluorobenzene	0.31		0.3330		93.1	70	130			
Surr: Dibromofluoromethane	0.32		0.3330		94.7	70	130			
Surr: Toluene-d8	0.33		0.3330		98.6	70	130			

Sample ID: <b>1303550-001a msd</b>	SampType: <b>MSD</b>	TestCode: <b>EPA Method 8260B: Volatiles Short List</b>								
Client ID: <b>SC-1</b>	Batch ID: <b>R9181</b>	RunNo: <b>9181</b>								
Prep Date:	Analysis Date: <b>3/14/2013</b>	SeqNo: <b>261831</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.68	0.050	0.6661	0	102	67.5	124	0.494	20	
Toluene	0.69	0.050	0.6661	0	104	55.8	142	3.20	20	
Surr: 1,2-Dichloroethane-d4	0.31		0.3330		92.5	70	130	0	0	

### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1303550

19-Mar-13

Client: Animas Environmental Services

Project: CoP Culpepper Martin #11C

Sample ID: 1303550-001a msd		SampType: MSD		TestCode: EPA Method 8260B: Volatiles Short List						
Client ID: SC-1		Batch ID: R9181		RunNo: 9181						
Prep Date:		Analysis Date: 3/14/2013		SeqNo: 261831		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	0.31		0.3330		93.8	70	130	0	0	
Surr: Dibromofluoromethane	0.32		0.3330		95.2	70	130	0	0	
Surr: Toluene-d8	0.33		0.3330		98.0	70	130	0	0	

## Qualifiers:

- |  |  |
|--|--|
| * Value exceeds Maximum Contaminant Level.   | B Analyte detected in the associated Method Blank    |
| E Value above quantitation range             | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit               |
| P Sample pH greater than 2                   | R RPD outside accepted recovery limits               |
| RL Reporting Detection Limit                 | S Spike Recovery outside accepted recovery limits    |



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87105  
TEL: 505-345-3975 FAX: 505-345-4101  
Website: www.hallenvironmental.com

## Sample Log-In Check List

Client Name:	Animas Environmental	Work Order Number:	1303550
Received by/date:	MG 03/14/13		
Logged By:	Lindsay Mangin	3/14/2013 10:00:00 AM	<i>[Signature]</i>
Completed By:	Lindsay Mangin	3/14/2013 10:06:54 AM	<i>[Signature]</i>
Reviewed By:	MG 03/14/13		

### Chain of Custody

1. Were seals intact? Yes ☒ No ☐ Not Present ☐
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

### Log In

4. Coolers are present? (see 19. for cooler specific information) Yes ☒ No ☐ NA ☐
5. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
6. Were all samples received at a temperature of  $>0^{\circ}\text{C}$  to  $6.0^{\circ}\text{C}$ ? Yes ☒ No ☐ NA ☐
7. Sample(s) in proper container(s)? Yes ☒ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
10. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
11. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
12. Were any sample containers received broken? Yes ☐ No ☒
13. Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes ☒ No ☐
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
15. Is it clear what analyses were requested? Yes ☒ No ☐
16. Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes ☒ No ☐

# of preserved bottles checked for pH:
( $<2$ or $>12$ unless noted)
Adjusted? _____
Checked by: _____

### Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

18. Additional remarks:

### 19. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			



## Journey, Denise D

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**From:** Payne, Wendy F  
**Sent:** Wednesday, June 26, 2013 11:19 AM  
**To:** GRP:SJBU Regulatory; Trujillo, Calvin M; Twilley, Bill C; Craig Willems; Mark Kelly; Mike Flaniken; Randy McKee; Robert Switzer; Roger Herrera; Sherrie Landon; Crawford, Dale T; Dee, Harry P; Eric Smith (sconsulting.eric@gmail.com); Faver Norman; Fred Martinez; Gardenhire, James E; Jared Chavez; Lowe, Terry; Marquez, Michael P; McCarty Jr, Chuck R; Payne, Wendy F; Peter, Dan J; Smith, Mike W; Steve McGlasson; Tally, Ethel; Becker, Joey W; Birchfield, Jack D; Bowker, Terry D; Brant Fourr; Frost, Ryan M; Goosey, Paul P; Gordon Chenault; Green, Cary Green J; GRP:SJBU Production Leads; Hockett, Christy R; Kennedy, Jim R; Leboeuf, Davin J; Lopez, Richard A; Nelson, Garry D; O'Nan, Mike J.; Peace, James T; Poulson, Mark E; Proctor, Freddy E; Roberts, Vance L.; Schaaphok, Bill; Smith, Randall O; Spearman, Bobby E; Stamets, Steve A; Barton, Austin; Blakley, Mac; Clugston, Danny K; Coats, Nathan W; Farrell, Juanita R; Hatley, Keri; Jones, Lisa; Rhoads, Travis P; Saiz, Kooper K; Seabolt, Elmo F; Thompson, Trey  
**Cc:** 'acedragline@yahoo.com'  
**Subject:** P&A Reclamation Notice: Culpepper Martin 11C (Area 1 \* Run 109)  
**Importance:** High

Ace Services will move a tractor to the **Culpepper Martin 11C** to start the reclamation process on **Tuesday, July 9, 2013**. Please Contact Steve McGlasson (716-3285) if you have questions or need further assistance.



1.Culpepper  
Martin 11C PA N...

Burlington Resources Well – Network # 10344113 – Activity Code D250 – PO: KGarcia  
San Juan county, NM

### Culpepper Martin 11C – FEE/FEE

1210' FSL & 1900' FEL

Sec.29, T32N, R12W

Unit Letter " O "

Lease # FEE

Latitude: 36.95298 N (NAD 27)

Longitude: 108.11552 W (NAD 27)

Elevation: 5924'

API # 30-045-30553

**Wendy Payne**  
**ConocoPhillips-SJBU**

**505-326-9533**

*Wendy.F.Payne@conocophillips.com*

## Journey, Denise D

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**From:** Gardenhire, James E  
**Sent:** Wednesday, February 27, 2013 2:27 PM  
**To:** Becker, Joey W; Bowker, Terry D; Cantrell, David M; Crawford, Lea A; Culbertson, Kenny W; Dee, Harry P; Ferrari, Mitchell R; Gallegos, Dale M; Gardenhire, James E; Gerard, Ricky D; Goosey, Paul P; Green, Cary Green J; GRP:SJBU Production Leads; GRP:SJBU Waste Request; Hamilton, Clayton C; Hatch, Josh A; Hoppe, Lynn D; Jones, Brett W; Jones, Tim (PAC); Kennedy, Jim R; Leboeuf, Davin J; Lopez, Richard A; Mars, Jim F; Montoya, Sheldon C; Moore, Mike M; Nelson, Garry D; Norris, Joel (Chenault Consulting Inc.); O'Nan, Mike J.; Payne, Wendy F; Peace, James T; Peel, Andrew; Pritchard, Ron R; Rey, Carlos P.; Roberts, Vance L.; Savage, Matthew; Schaaphok, Bill; SJ SCADA; Spearman, Bobby E; Tafoya, John D; Trujillo, Calvin M; Twilley, Bill C; Wells, Charlie A; Wood, Len (Chenault Consulting Inc.)  
**Subject:** P&A Facility Strip Notice: Culpepper Martin 11C ( Area 1 \* Run 109)  
**Importance:** High

Please find the legal's for the **Culpepper Martin 11C (P&A)** for stripping of all equipment. A full strip is required in preparation of the reclamation. Contact Harry Dee (320-3429) if you have any questions. CP only services this location, ok to strip facilities.

Directions from the Post Office in La Plata, NM to Burlington Culpepper Martin 11C 1210' FSL & 1900' FEL, Sec. 29, T32N, R12W, San Juan County, NM

From the Post Office in La Plata, NM

Go north on Hwy 170 for 2.0 miles to Hwy 574.

Turn right on Hwy 574 and go easterly 4.0 miles.

Turn left and go north-easterly 0.6 miles.

Turn left and go northerly 2.1 miles.

Turn left and go westerly 0.5 miles

Turn left and go south-westerly 200 Ft.

Turn left and go south-easterly 0.3 miles.

Turn right and go south-westerly 0.1 miles.

Turn left and travel 500+/- to location.

Thank you.

Burlington Well - Network-10344113 - Activity Code C200 - PO: Kgarcia  
San Juan County, NM

**Culpepper Martin 11C**

1210' FSL & 1900' FEL

Sec. 29, T32N, R12W

Unit Letter " O "

Lease # Fee

Latitude: 36.9529800 N (NAD 27)

Longitude: 108.115520 W (NAD 27)

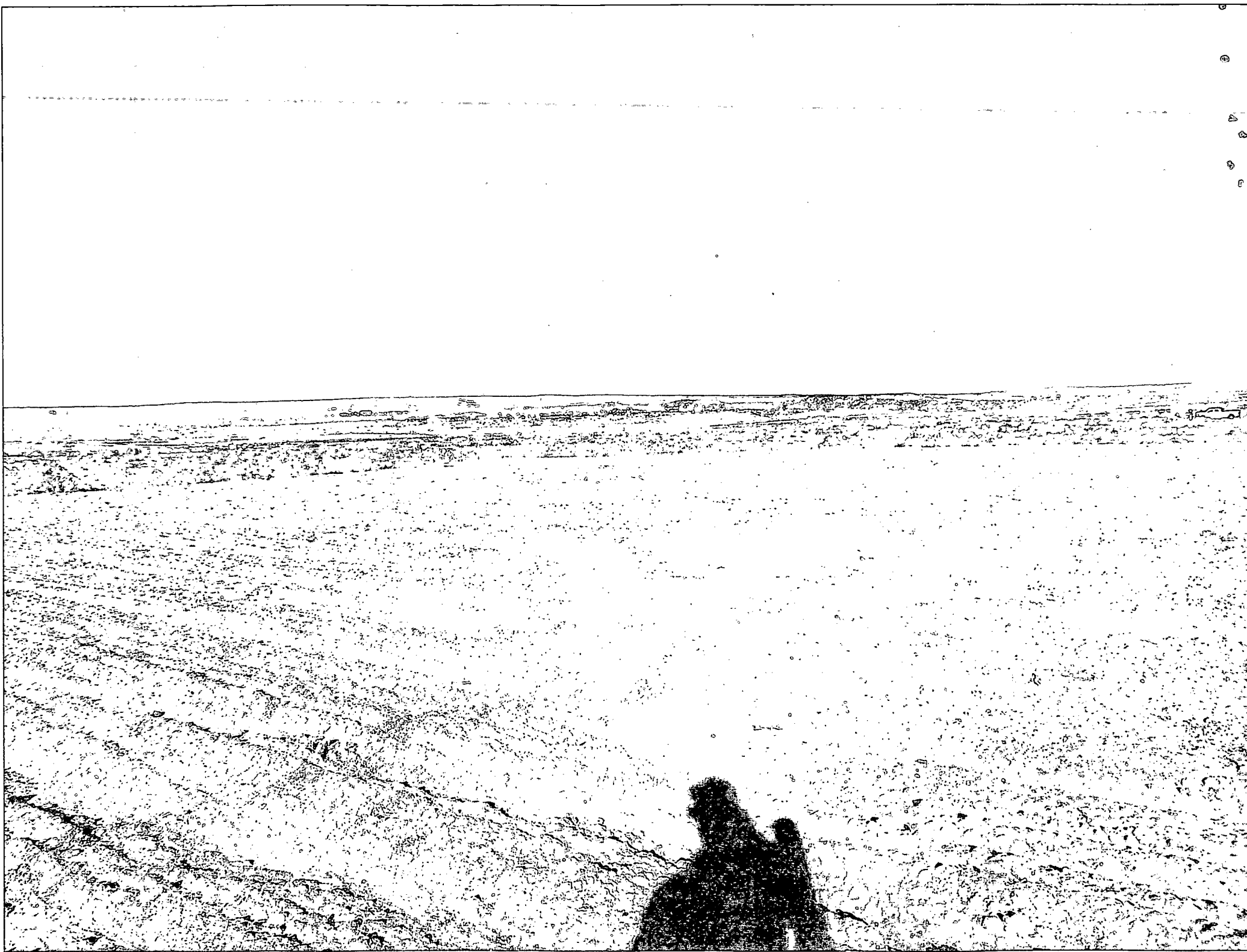
Elevation: 5924'

Pipeline: WFS

API # 30-045-30553







December 27, 2013

During our internal audit it was discovered that the **Culpepper Martin 11C BGT Permit** was never closed.

The well was P&A'd 2/19/13 and the BGT was pulled at that time.

RCVD DEC 31 '13  
OIL CONS. DIV.  
DIST. 3

**Burlington Resources Oil Gas Company, LP**  
**San Juan Basin**  
**Below Grade Tank Closure Report**

RCVD JAN 10 '14  
OIL CONS. DIV.  
DIST. 3

**Lease Name: CULPEPPER MARTIN 11C**  
**API No.: 30-045-30553**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**
3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

**All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.**

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

**The below-grade tank was disposed of in a division-approved manner.**

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

**All on-site equipment associated with the below-grade tank was removed.**

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.
7. **A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.**

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

**A release was not determined for the above referenced well.**

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

**The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.**

10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
- Operator's name
  - Location by Unit Letter, Section, Township, and Range. Well name and API number.

**No notification found. See attached explanation.**

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

**The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)**

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

**The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.**

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

**Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.**

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

**The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.**

15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:

- Soil Backfilling and Cover Installation **(See Report)**
- Re-vegetation application rates and seeding techniques **(See Report)**
- Photo documentation of the site reclamation **(Included as an attachment)**
- Confirmation Sampling Results **(Included as an attachment)**
- Proof of closure notice **(Included as an attachment)**

Date: 12/30/13

**CULPEPPER MARTIN 11C**

30-045-30553

**BGT Closure**

Burlington Resources is submitting a Below Grade Tank (BGT) Closure Report to the District III NMOCD. Notification for approval of the above BGT was sent to Santa Fe on 2/21/13 and approved on 2/22/13.

Included in the BGT Closure Packet are the following documents:

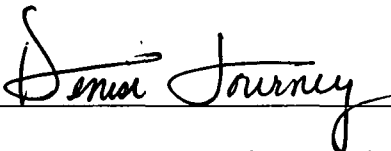
C144 BGT Closure Report

Closure Summary Report

BGT Closure Report

Pictures

The Proof of Closure e-mail to District III NMOCD is missing. ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

A handwritten signature in black ink, reading "Denise Journey", is written over a horizontal line.

Denise Journey, Regulatory Technician

ConocoPhillips Company