District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 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 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Salita 1 9, 1 (11 0 7 5 0 5 5 1 to the appropriate
Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP America Production Company OGRID #:
Facility or well name:Riddle F LS 3A
Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary:
Secondary containment with leak detection Visible sidewalls only Other _Single walled/double bottomed; side walls not visible
4. Alternative Method:

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

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)	hospital,
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)	
7.	
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	
Nation State	
Please check a box if one or more of the following is requested, if not leave blank:	
☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
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 acceptate are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells	Yes No
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	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. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. (Does not apply to below grade tanks) 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. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	Yes No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	Yes No
 application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet 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 search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).	
- Topographic map; Visual inspection (certification) of the proposed site	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 spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
	☐ 1 <i>c</i> 2 ☐ 140
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, 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 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.	
Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	
☐ Previously Approved Design (attach copy of design) API Number: or Permit Number:	
11. Multi-Well Fluid Management Pit 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 doc attached.	cuments are
☐ 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 ☐ A List of wells with approved application for permit to drill associated with the pit.	
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 Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

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 attached.	documents are
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 ₂ 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	
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 Multi-well F	luid Management Pit
☐ Alternative Proposed Closure Method: ☐ Waste Excavation and Removal ☐ Waste Removal (Closed-loop systems only) ☐ On-site Closure Method (Only for temporary pits and closed-loop systems)	
☐ In-place Burial ☐ On-site Trench Burial ☐ Alternative Closure Method	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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 C 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 H of 19.15.17.13 NMAC	
15. 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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
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 ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; 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 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 Within a 100-year floodplain.	Yes No									
- FEMA map										
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements 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 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 H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	.11 NMAC .15.17.11 NMAC									
17. Operator Application Certification:										
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and bel	ief.									
Name (Print):	·									
Signature: Date:										
oignature.										
e-mail address:	_									
e-mail address:										
e-mail address:										
e-mail address: Telephone:	2014 g the closure report.									
e-mail address: Telephone:	2014 g the closure report.									
e-mail address: Telephone:	the closure report.									

Form C-144

'Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closur belief. I also certify that the closure complies with all applicable closure requir	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Name (Print):Jeff Peace	Date:November 5, 2014
e-mail address:peace.jeffrey@bp.com	Telephone:(505) 326-9479

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Riddle F LS 3A API No. 3004523697 Unit Letter F, Section 20, T28N, R8W

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. 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. 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 were 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
	95 bbl BGT	(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	290
Chlorides	US EPA Method 300.0 or 4500B	250 or background	190

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. TPH was 290 pm by Method 418.1 but was only 38 ppm by Method 8015D. 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 indicate 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 and is still within the active area.

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 over the BGT is covered by the raised compressor pad and is still within the active well area. 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 over the BGT is covered by the raised compressor pad and is still within the active well area. 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 over the BGT is covered by the raised compressor pad and is still within the active well area. 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.

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

State of New Mexico Energy Minerals and Natural Resources

Revised August 8, 2011
Submit 1 Copy to appropriate District Office in

Form C-141

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.

Release Notificati	on and Co	orrective A	ction							
OPERATOR Initial Report										
Name of Company: BP	Contact: Jet	f Peace								
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479									
Facility Name: Riddle F LS 3A	Facility Type: Natural gas well									
Surface Owner: Federal Mineral Owner	er: Federal		API N	o. 3004523697						
LOCATION	ON OF RE	LEASE								
7,700	rth/South Line	Feet from the	East/West Line	County: San Juan						
F 20 28N 8W 1,825 No.		Journal Sun Such								
Latitude 36.64930	Longitud	e 107.70795								
	E OF REL									
Type of Release: none		Release: N/A	Volume	Recovered: N/A						
Source of Release: below grade tank – 95 bbl		Iour of Occurrence		Hour of Discovery:						
Was Immediate Notice Given?	If YES, To		ce. Date and	Hour of Discovery.						
☐ Yes ☐ No ☒ Not Require		Whom:								
By Whom?	Date and I-	lour	-							
Was a Watercourse Reached?		olume Impacting t	the Watercourse.							
☐ Yes ☒ No										
If a Watercourse was Impacted, Describe Fully.*										
	Sat 911 at	1 000 1								
Describe Cause of Problem and Remedial Action Taken.* Sampling of the BGT. Soil analysis resulted in TPH, BTEX and chloride below sta										
Analysis results are attached.	maaras. 1111 w	as 290 ppin by iv	iemou 416.1 out o	my 38 ppm by Method 8013D.						
Describe Area Affected and Cleanup Action Taken.* BGT was remove		n down oath the DC	T T-d T	The case and at the DCT area						
backfilled and compacted and is still within the active well area.	ed and the area u	nderneath the BG	i I was sampled. I	ne area under the BGT was						
backfined and compacted and is som within the active wen area.										
I hereby certify that the information given above is true and complete to										
regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by										
should their operations have failed to adequately investigate and remed			•							
or the environment. In addition, NMOCD acceptance of a C-141 repor										
federal, state, or local laws and/or regulations.										
\cap		OIL CON:	SERVATION	DIVISION						
Simon Of Read of										
Signature: Yell Coall	-	D								
Printed Name: Jeff Peace	Approved by	Environmental S	pecialist:							
				_						
Title: Field Environmental Coordinator	Approval Dat	e:	Expiration	Date:						
E-mail Address: peace.jeffrey@bp.com	Conditions of	`Approval:								
D man Address, peace, joines, esperiorm		PP- 0 . W.		Attached						
Date: November 5, 2014 Phone: 505-326-9479										

^{*} Attach Additional Sheets If Necessary

·						
CLIENT: BP	BLAGG ENG	INEERING, INC.		API#: 30 (1452369	97
CLIENT: DF	P.O. BOX 87, BLC	OMFIELD, NM 87413	3	TANKLID	_	<u> </u>
	(505)	632-1199		TANK ID (if applicble):	<u> </u>	
FIELD REPORT:	(circle one): BGT CONFIRMATION / RE	LEASE INVESTIGATION / OTHER:		PAGE#:	1 of	1
SITE INFORMATION	I: SITE NAME: RIDDLE F	LS#3A		DATE STARTED:	04/15/	/13
QUAD/UNIT: F SEC: 20 TWP:	28N RNG: 8W PM:	NM CNTY: SJ ST:	MI	DATE FINISHED:		
1/4 -1/4/FOOTAGE: 1,825'N / 1,625	5'W SW/NW LEASE TYPE		IAN	ENVIRONMENTAL		
LEASE #: SF 080112	PROD. FORMATION: CHR/MV CONT	ELKHORN RACTOR: MBF - S. GENTRY		SPECIALIST(S):	JCE	3
REFERENCE POINT	. WELL HEAD (W.H.) GPS CO	ORD.: 36.64917 X 107.	70782	GL ELI	EV.: 5.73	 34'
1) 95 BGT (SW/DB)				ARING FROM W.H.:	001 1100	
2)			TANCE/BEA	ARING FROM W.H.:		
3)				ARING FROM W.H.:		
4)	GPS COORD.:	DI\$	TANCE/BE/	ARING FROM W.H.:		
SAMPLING DATA:	[***				R	OVM READING
1) SAMPLE ID: 95 BGT 5-pt. @	_		418 1/8	:015B/8021B/30		(ppm) 0.0
2) SAMPLE ID:					` ′	
3) SAMPLE ID:						
4) SAMPLE ID:						
SOIL DESCRIPTION SOIL COLOR: MOD	SOIL TYPE: SAND SILTY SAN	ND / SILT / SILTY CLAY / CLAY / GRA\ 	ÆL / OTH	HER		
COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY		PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY	PLASTIC / C	OHESIVE / MEDILIM PLASTI	IC / HIGHLY PLAST	TIC
CONSISTENCY (NON COHESIVE SOILS): LC		DENSITY (COHESIVE CLAYS & SILTS				
MOISTURE: DRY/SLIGHTLYMOIST/MOIST/W		HC ODOR DETECTED: YES NO	EXPLA	ANATION		
SAMPLE TYPE: GRAB COMPOSITE #						
DISCOLORATION/STAINING OBSERVED	YES/NO] EXPLANATION -	<u> </u>		<u>. </u>		
ANY AREAS DISPLAYING WETNESS: YES / NO	EXPLANATION -					
APPARENT EVIDENCE OF A RELEASE C		NO EXPLANATION:				
ADDITIONAL COMMENTS: COLLECTED	SAMPLE BENEATH PEA GRAVEL.					
SOIL IMPACT DIMENSION ESTIMATION:	NA ft. X NA ft.	XNA ft. EXCAVAT	ON EST	IMATION (Cubic Ya	rds): N	NA AV
			NMOC	D TPH CLOSURE STE	: <u>100</u>	ppm
SITE SKETCH		PLOT PLAN circle: attache	d OWN	CALIB. READ. = 52	O nom	
		TEOTI BUV small	```	CALIB. GAS = 10		RF = 0.52
		N	. []		DATE: 04/15	5/13
/	X PBGTL	IN				
, X	X x X → T.B. ~ 5' B.G.		l	MISCELL		:0
`	X B.G.		_ I 	o: N15093	317	
				0 #: <: ZEVH01	BCT2	
			-	J#: Z2-0069		
				ermit date(s):	06/14/10	0
				CD Appr. date(s):	08/21/12	
			Tan	k OVM = Organi	c Vapor Meter	
	то		Ā			
	W.H.	X - S.P.D.		BGT Sidewalls Vis	ible: Y / N	
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATIO	ON DEPRESSION; B.G. = BELOW GRADE; B = BELOW	T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HE	ND;	BGT Sidewalls Vis		
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL	OW-GRADE TANK LOCATION; SPD = SAMPLE POINT E WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; I	DESIGNATION; R.W. = RETAINING WALL; NA - NOT	<u>M</u>	lagnetic declinat	ion: 10° E	E
TRAVEL NOTES: CALLOUT:	. YWALL, DAY - DOUDLE YWALL, OD - SHYULE DOT TOWN,	ONSITE: 04/15/13				

Analytical Report

Lab Order 1304713

Date Reported: 4/29/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Riddle F LS #3A **Project:**

Lab ID: 1304713-001 Client Sample ID: 95 BGT 5PC@TB@5'

Collection Date: 4/15/2013 12:12:00 PM

Received Date: 4/17/2013 10:00:00 AM

Analyses	Result	RL Qual Units		DF	Date Analyzed
EPA METHOD 8015D: DIESEL RANG	E ORGANICS				Analyst: GSA
Diesel Range Organics (DRO)	38	10	mg/Kg	1	4/20/2013 6:46:33 AM
Surr: DNOP	110	63-147	%REC	1	4/20/2013 6:46:33 AM
EPA METHOD 8015D: GASOLINE RA	NGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.6	mg/Kg	1	4/25/2013 2:28:02 AM
Surr: BFB	89.7	80-120	%REC	1	4/25/2013 2:28:02 AM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.046	mg/Kg	1	4/25/2013 2:28:02 AM
Toluene	ND	0.046	mg/Kg	1	4/25/2013 2:28:02 AM
Ethylbenzene	ND	0.046	mg/Kg	1	4/25/2013 2:28:02 AM
Xylenes, Total	ND	0.092	mg/Kg	1	4/25/2013 2:28:02 AM
Surr: 4-Bromofluorobenzene	99.4	80-120	%REC	1	4/25/2013 2:28:02 AM
EPA METHOD 300.0: ANIONS					Analyst: JRR
Chloride	190	7.5	mg/Kg	5	4/19/2013 2:13:58 PM
EPA METHOD 418.1: TPH			•		Analyst: LRW
Petroleum Hydrocarbons, TR	290	20	mg/Kg	1	4/19/2013

Matrix: SOIL

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range Е
- Analyte detected below quantitation limits
- Sample pH greater than 2
- Reporting Detection Limit

- Analyte detected in the associated Method Blank В
- Н Holding times for preparation or analysis exceeded
- Not Detected at the Reporting Limit ND
 - R RPD outside accepted recovery limits
 - Spike Recovery outside accepted recovery limits Page 1 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1304713

29-Apr-13

Client:

Blagg Engineering

Project:

Riddle F LS #3A

Sample ID: MB-7071

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 7071

RunNo: 10014

Prep Date: 4/19/2013

Analysis Date: 4/19/2013

SeqNo: 285211

Units: mg/Kg HighLimit

RPDLimit

Qual

Analyte Chloride

ND

Sample ID: LCS-7071

SampType: LCS

TestCode: EPA Method 300.0: Anions

Client ID: LCSS

Batch ID: 7071

RunNo: 10014

Prep Date: 4/19/2013 Analysis Date: 4/19/2013

14

220

Result

200

Result

SegNo: 285212

Units: mg/Kg

110

%RPD

%RPD

%RPD

Qual

Analyte Chloride

Result **PQL**

1.5

SPK value SPK Ref Val

15.00

15.00

15.00

%REC LowLimit 94.6

HighLimit

RPDLimit

Sample ID: 1304713-001AMS

SampType: MS

TestCode: EPA Method 300.0: Anions

RunNo: 10014

Client ID: Prep Date:

4/19/2013

Batch ID: 7071 Analysis Date: 4/19/2013

7.5

7.5

SeqNo: 285224

333

Units: mg/Kg

Analyte Chloride

95 BGT 5PC@TB@5

Result **PQL**

SPK value SPK Ref Val

167.0

SPK value SPK Ref Val %REC

167.0

SPK value SPK Ref Val %REC LowLimit

%REC LowLimit

64.4

64.4

HighLimit 117 **RPDLimit**

Qual S

Sample ID: 1304713-001AMSD

SampType: MSD

TestCode: EPA Method 300.0: Anions

Client ID: Prep Date:

95 BGT 5PC@TB@5 4/19/2013

Batch ID: 7071

RunNo: 10014

220

Units: mg/Kg

Qual

Analyte Chloride

Analysis Date: 4/19/2013

SeaNo: 285225

LowLimit HighLimit

%RPD

8.11

RPDLimit 20

S

Qualifiers:

Value exceeds Maximum Contaminant Level.

E Value above quantitation range

р Sample pH greater than 2

Analyte detected below quantitation limits

Reporting Detection Limit

Analyte detected in the associated Method Blank

Н Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit RPD outside accepted recovery limits R

Spike Recovery outside accepted recovery limits

Page 2 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1304713

29-Apr-13

Client:

Blagg Engineering

Project:

Riddle F LS #3A

Sample ID: MB-7054

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID: Prep Date:

PBS

Batch ID: 7054

RunNo: 9997

Units: mg/Kg

Analyte

4/18/2013

Analysis Date: 4/19/2013

SeqNo: 284837

%RPD

RPDLimit Qual

Petroleum Hydrocarbons, TR

Result ND

Result

90

89

PQL

20

SPK value SPK Ref Val %REC LowLimit

LowLimit

HighLimit

Sample ID: LCS-7054

SampType: LCS

TestCode: EPA Method 418.1: TPH

Client ID: LCSS

Batch ID: 7054

RunNo: 9997

120

RPDLimit

Analyte

Prep Date:

4/18/2013

Analysis Date: 4/19/2013

SeqNo: 284838 %REC

90.1

Units: mg/Kg HighLimit

%RPD

Qual

Petroleum Hydrocarbons, TR

Sample ID: LCSD-7054

SampType: LCSD

TestCode: EPA Method 418.1: TPH

RunNo: 9997

Client ID: LCSS02

Batch ID: 7054

SPK value SPK Ref Val

SeqNo: 284839

Units: mg/Kg

%RPD

1.34

RPDLimit Qual

Analyte Petroleum Hydrocarbons, TR

Prep Date: 4/18/2013

Analysis Date: 4/19/2013 PQL

20

PQL

20

SPK value SPK Ref Val 100.0

100.0

%REC 88.9

LowLimit 80 HighLimit 120

20

Qualifiers:

Value exceeds Maximum Contaminant Level.

Analyte detected below quantitation limits

Value above quantitation range Е

Sample pH greater than 2 P

Reporting Detection Limit

Analyte detected in the associated Method Blank

· Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit RPD outside accepted recovery limits

Spike Recovery outside accepted recovery limits

Page 3 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1304713

29-Apr-13

Client: Blagg Engineering Project: Riddle F LS #3A

Sample ID: LCS-7056 SampType: LCS TestCode: EPA Method 8015D: Diesel Range Organics LCSS Client ID: Batch ID: 7056 RunNo: 9993 Prep Date: 4/18/2013 Analysis Date: 4/19/2013 SeqNo: 284769 Units: mg/Kg Result POL SPK value SPK Ref Val %REC HighLimit %RPD **RPDLimit** Analyte LowLimit Qual Diesel Range Organics (DRO) 49 10 50.00 0 97.9 47.4 122 Surr: DNOP 5.7 5.000 114 63 147

Sample ID: MB-7056 SampType: MBLK TestCode: EPA Method 8015D: Diesel Range Organics Client ID: PBS Batch ID: 7056 RunNo: 9993 Analysis Date: 4/19/2013 SeqNo: 284770 Units: mg/Kg Prep Date: 4/18/2013 Result SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Analyte **PQL** Diesel Range Organics (DRO) ND 10 Surr: DNOP 9.8 10.00 98.4 63 147

Sample ID: 1304702-020AMS SampType: MS TestCode: EPA Method 8015D: Diesel Range Organics Client ID: BatchQC Batch ID: 7056 RunNo: 9993 Prep Date: 4/18/2013 Analysis Date: 4/19/2013 SeqNo: 285139 Units: mg/Kg Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Analyte Diesel Range Organics (DRO) 0 56 10 50.00 112 12.6 148 Surr: DNOP 5.8 5.000 116 63 147

Sample ID: 1304702-020AMSD SampType: MSD TestCode: EPA Method 8015D: Diesel Range Organics Client ID: **BatchQC** Batch ID: 7056 RunNo: 9993 Prep Date: 4/18/2013 Analysis Date: 4/20/2013 SeqNo: 285141 Units: mg/Kg Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Analyte Diesel Range Organics (DRO) 55 10 50.05 110 12.6 148 1.66 22.5 5.005 0 Surr: DNOP 5.8 116 63 147 0

Qualifiers:

Value exceeds Maximum Contaminant Level.

Value above quantitation range Ė

Analyte detected below quantitation limits

Sample pH greater than 2

Reporting Detection Limit RL

Analyte detected in the associated Method Blank В

Holding times for preparation or analysis exceeded Н

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

Spike Recovery outside accepted recovery limits

Page 4 of 4



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-410; Website: www.hallenvironmental.com

Sample Log-In Check List

BLAGG Client Name: Work Order Number: 1304713 RcptNo: 1 Received by/date: Logged By: **Ashley Gallegos** 4/17/2013 10:00:00 AM Completed By: **Ashley Gallegos** 4/17/2013 3:17:51 PM Reviewed By: Chain of Custody Yes 🗍 No 🗆 Not Present 1 Custody seals intact on sample bottles? No 🗌 Not Present 2. Is Chain of Custody complete? Yes V 3 How was the sample delivered? Courier Log In No □ Yes 🗸 NA 🗍 4. Was an attempt made to cool the samples? 5. Were all samples received at a temperature of >0° C to 6.0°C Yes 🗸 No 🗔 NA 🗀 No 🗆 Sample(s) in proper container(s)? Yes 🗸 7. Sufficient sample volume for indicated test(s)? Yes 🗸 No Yes 🗹 No 🗆 8. Are samples (except VOA and ONG) properly preserved? NA 🗌 No 🗸 9. Was preservative added to bottles? Yes \square 10.VOA vials have zero headspace? No VOA Vials Yes 🗌 No 🗆 Yes No 🗸 11. Were any sample containers received broken? # of preserved bottles checked No 🔲 for pH: Yes 🗹 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No 🗆 13. Are matrices correctly identified on Chain of Custody? Yes 🔽 No 🗆 14. Is it clear what analyses were requested? Yes 🗸 No 🗌 Checked by: 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) Yes No 🗌 NA 🗹 16. Was client notified of all discrepancies with this order? Person Notified: Date: By Whom: eMail Phone Fax Via: In Person Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp C Condition Seal Intact Seal No Seal Date Good

		.of-Cu	stody Record	Turn-Around	Time:			HALL ENVIRONMEN				BIT	AI									
Client:	BLAGE	s ENGIA	DEERING INC.	Standard	□ Rush																AL RY	7
				Project Name):		•		www.hallenviron 4901 Hawkins NE - Albuqu													
Mailing	Address:	P.O. I	30x 87	RIDDLE	E F LS	#3A																
BLOMFIELD NM 87413			BLOOMFIELD NM 87413							l. 50					ax 5							
Phone	#: S	05-0	032-1199					12.00		and you have		W.J.	Á	naly	sis, l	Requ	uest	B 197	,		-4- 4.	#
email o				Project Mana	ger:				<u>Ş</u>	Q		- }			3			1				
QA/QC I	Package: dard		□ Level 4 (Full Validation)	J.B	LA66			ETMB's (8021)	(Gas o	30 /44	ŀ		SIMS)		,PO ₄ ,S(PCB's						
Accredi	tation			Sampler:	T- BLAGG				H	Ö/	=		ĕ	Ī	Q	88			ļ	Ì		9
□ NEL	AP	☐ Othe		Oth ree	V Yes	IEMO. TAS			+	8	8	<u>8</u>	- 82	,,	أق	3/s	ļ	3				5
	(Type)_			Sample Jemi	eratire			出	BE.	<u>B</u>	bd 4	B B	0	ig	Ž	ige	ৱ	۲	اليز			≿
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type			BTEX +-MTBE	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO /4林氏の)	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 / 8082	8260B (VOA)	8270 (Semi-VOA)	CHLORIDE			Air Bubbles (Y or N)
15/2013	1212	SOIL	95 BGT SPC Q TBC 5	402 x 1	COOL	- <i>ù</i>	01	Х			X								X			I
																						
											1											T
																						I
													$ \bot $							_		
													\downarrow									\downarrow
																	_				_	_
	-										-	_							_	+		+
				 .							\dashv	-				-		_	\rightarrow	\dashv	+	+
				ļ							-	-	\dashv						\dashv	+		+
Date:	Time:	Relinquishe	l ed by: Blegg	Received by:	Walter	Date 4/10/2013	Time 12.47	Rem	narks	s: į	31U	L	III BP : Pa	 : :KKE	l	 20	 =VH	<u> </u>	B6	 T ス		
Date:	Time:	Relinquishe	ed by:	Received by:	,	Date	Time					Wa	ORK	oro	ER	13	150	93	317			
1/14/13		Mis	tu Walan C		04	17/13	[000]			A	h a•								ACE			



