District I 1625 N. French Dr., Hobbs, NM 88240 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** Department Oil Conservation Division 1220 South St. Francis Dr.

Revised June 6, 2013

Form C-144

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.

Pit, Below-Grade Tank, or

Santa Fe, NM 87505

12459 Proposed Alternative Method Permit or Closure Plan Application CONS. DIV DIST. 3
Type of action: Graph
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 #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Mudge LS 50
API Number:3004523281 OCD Permit Number:
U/L or Qtr/QtrF Section23 Township31N Range11W County:San Juan
Center of Proposed Design: Latitude36.886912 Longitude107.964054 NAD: ☐1927 ☒ 1983
Surface Owner: X Federal X State Trivate Tribal Trust or Indian Allotment
Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D
3. Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A Volume:95.0 bbl Type of fluid:Produced water
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other _Double walled/double bottomed; side walls not visible
Liner type: Thicknessmil
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 .	
6.	· · · · · · · · · · · · · · · · · · ·
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	
S. A.	
<u>Variances and Exceptions:</u> 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: Uariance(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.	
9. 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 acceptance of the compliance for each siting criteria below in the application.	ptable source
material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	
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
	☐ Yes ☐ No
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA □
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No
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	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)	Yes No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	
 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).	Yes No
- Topographic map; Visual inspection (certification) of the proposed site	
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 ☐ Nö		
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		
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:			
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. 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 19.15.17.12 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	documents are
attached. ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Climatological Factors Assessment ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Quality Control/Quality Assurance Construction and Installation Plan ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan ☐ Cil 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 Falternative 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	Fluid Management Pit
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 Site Reclamation Plan - based upon the appropriate requirements of Subsection H 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 sou provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 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
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 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	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

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	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 E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 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 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 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 H of 19.15.17.13 NMAC												
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 beli												
Name (Print): Title:												
Signature: Date:												
e-mail address: Telephone:												
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 12/23 Title: OCD Permit Number:	5/20H											
19. Closure Report (required within 60 days of closure completion): 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date:10/23/2014_												
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-lo ☐ If different from approved plan, please explain.	op systems only)											
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please incomark 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 for private land only) □ Plot Plan (for on-site closures and temporary pits) □ Confirmation Sampling Analytical Results (if applicable) □ Waste Material Sampling Analytical Results (required for on-site closure) □ Disposal Facility Name and Permit Number □ Soil Backfilling and Cover Installation □ Re-vegetation Application Rates and Seeding Technique	dicate, by a check											

Form C-144 Oil Conservation Division Page 5 of 6

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):Jeff Peace	Title: Field Environmental Coordinator											
Signature: Jeff Posee	Date:December 9, 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

Mudge LS 50 <u>API No. 3004523281</u> Unit Letter F, Section 23, T31N, R11

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.
 - Notice is attached.
- 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.

Notice is attached.

- 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	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

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

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

7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results 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 well 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 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 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 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 as part of final reclamation.

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

			Rel	ease Notific	cation	and Co	orrective A	ction						
						OPERA	ГOR		Initi	al Report	\boxtimes	Final Repor		
Name of Co					Contact: Jef	No.								
		Court, Farm	IM 87401			No.: 505-326-94								
Facility Na	me: Mudg	e LS 50	-		I	Facility Typ	e: Natural gas v	vell						
Surface Ow	ner: Feder	al		Mineral C	Owner: F	Federal			API No	. 3004523	281			
				LOCA	ATION	OF REI	LEASE							
Unit Letter F	Section 23	Township 31N	Range 11W	Feet from the 1,590	North/S North	South Line	Feet from the 1,540	County: S	County: San Juan					
		Latit	ude36	5.886912		Longitud	e 107.964054_	<u></u>						
				NAT	URE	OF RELI	EASE							
Type of Rele	ase: none	•					Release: N/A		Volume F	Recovered:	N/A			
		w grade tank -	- 95 bbl			-	lour of Occurrenc			Hour of Di		: N/A		
Was Immedi	ate Notice (Yes [No Not Re	equired	If YES, To	Whom?	1						
By Whom?					-	Date and H	lour							
Was a Water	course Read		Yes ∑] No			olume Impacting t	he Watero	ourse.					
If a Wataraa	iroa iiioa Im	pacted, Descr	ibo Eulleri	*										
Describe Are	il analysis t	esulted in TP.	H, BTEX	n Taken.* Sampli and chlorides belo ken.* BGT was re active well area.	ow standa	ards. Analys	is results are attac	ched.				•		
regulations a public health should their cor the environment.	Il operators or the envi operations h nment. In a	are required tronment. The tave failed to	o report and acceptant adequately OCD accept	e is true and comp nd/or file certain r ce of a C-141 repo investigate and r otance of a C-141	elease no ort by the emediate	tifications ar NMOCD m contaminati	nd perform correct arked as "Final Re on that pose a thre	tive actior eport" doe eat to grou	ns for rele s not reli and water	eases which leve the ope r, surface w	n may er erator of ater, hu	ndanger f liability man health		
Signature:	Jeff	Passe	/			OIL CONSERVATION DIVISION Approved by Environmental Specialist:								
Printed Name	e: Jeff Peac	e			F	approved by	Environmental SJ	pecialist:						
Title: Field E	nvironmen	tal Coordinate	or		A	Approval Dat	e:	Ex	piration l	Date:				
		effrey@bp.co				Conditions of								
Date: Decen Attach Addi		4 ets If Necess		ne: 505-326-9479			· 							

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004523281 TANK ID (if applicble): A
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE #: 1 of 1
QUAD/UNIT: F SEC: 23 TWP: 1/4-1/4/FOOTAGE: 1,590'N / 1,5	SITE NAME: MUDGE LS # 50 31N RNG: 11W PM: NM CNTY: SJ ST: NM 40'W SE/NW LEASE TYPE: FEDERAL STATE / FEE / INDIAN PROD. FORMATION: PC CONTRACTOR: MBF - S. GLYNN	DATE STARTED: 10/21/14 DATE FINISHED: ENMRONMENTAL SPECIALIST(S): NJV
PEFERENCE POINT 1) 95 BGT (DW/DB) 2) 3)	### WELL HEAD (W.H.) GPS COORD.: 36.88674 X 107.964000 GPS COORD.: 36.886912 X 107.964054 DISTANCE/BE GPS COORD.: DISTANCE/BE	GL ELEV: 5,821' ARRING FROM W.H.: FARRING FROM W.H.: ARRING FROM W.H.:
SAMPLING DATA: 1) SAMPLE ID: 5 PC-TB @ 5' 2) SAMPLE ID: 3) SAMPLE ID:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL (95) SAMPLE DATE: 10/21/14 SAMPLE TIME: 1100 LAB ANALYSIS: 41 SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: LAB ANALYSIS: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	8.1/8021B/300.0 (CI) OVM READING (ppm) NA
SOIL COLOR: MODERATE COHESION (ALL OTHERS) NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST MOIST / W SAMPLE TYPE: GRAB COMPOSITE # DISCOLORATION/STAINING OBSERVED: YES (NOTE OF THE OBSERVATION)	COHESIVE / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM HC ODOR DETECTED: YES NO EXPLANATION - LOST INTEGRITY OF EQUIPMENT: YES NO EXPLANATION - LOST INTEGRITY OF EXPLANATION - LOST INTEGRITY OF EQUIPMENT: YES NO EXPLANATION - LOST INTEGRITY OF EXPLA	/ STIFF / VERY STIFF / HARD WATION -
SITE SKETCH PBGTL T.B. ~ 5' B.G. NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION	BGT Located: off on site PLOT PLAN circle: attached OV TIME PLAN C	STIMATION (Cubic Yards): NA MCALIB. READ. = NA ppm MCALIB. GAS = NA ppm MISCELL. NOTES MO: N15502061 PO #: PK: ZEVH01BGT2 PJ #: Z2-006Q0 Permit date(s): 06/14/10 DCD Appr. date(s): 07/18/14 ank OVM = Organic Vapor Meter ppm = parts per million A BGT Sidewalls Visible: Y / N BGT Sidewalls Visible: Y / N
T.B. = TANK BOTTOM, PBGTL = PREVIOUS BEL	OW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	Magnetic declination: 10° E

Analytical Report

Lab Order 1410A18

Date Reported: 10/23/2014

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB @ 5' (95)

Project: Mudge LS #50

Collection Date: 10/21/2014 11:00:00 AM

Lab ID: 1410A18-001

Matrix: MEOH (SOIL) Received Date: 10/22/2014 8:00:00 AM

Analyses	Result RL Qual Units						
EPA METHOD 8021B: VOLATILES					Analy	/st: NSB	
Benzene	ND	0.037	mg/Kg	1	10/22/2014 12:40:15	PM R22067	
Toluene	ND	0.037	mg/Kg	1	10/22/2014 12:40:15	PM R22067	
Ethylbenzene	ND	0.037	mg/Kg	1	10/22/2014 12:40:15	PM R22067	
Xylenes, Total	ND	0.074	mg/Kg	1	10/22/2014 12:40:15	PM R22067	
Surr: 4-Bromofluorobenzene	91.8	80-120	%REC	1	10/22/2014 12:40:15	PM R22067	
EPA METHOD 300.0: ANIONS					Analy	/st: LGP	
Chloride	ND	30	mg/Kg	20	10/22/2014 12:14:24	PM 16026	
EPA METHOD 418.1: TPH					Analy	st: BCN	
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	10/22/2014 2:00:00 F	PM 16029	

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

Page 1 of 4

- P Sample pH greater than 2.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1410A18 23-Oct-14

Client:

Blagg Engineering

Project:

Mudge LS #50

Sample ID MB-16026

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

Batch ID: 16026

RunNo: 22092

Prep Date:

10/22/2014

PQL

Analysis Date: 10/22/2014

SeqNo: 649803

Units: mg/Kg

HighLimit

RPDLimit Qual

Analyte Chloride

ND 1.5

Sample ID LCS-16026

SampType: LCS

TestCode: EPA Method 300.0: Anions

%RPD

LCSS Client ID:

Batch ID: 16026

RunNo: 22092

Prep Date: 10/22/2014 Analysis Date: 10/22/2014

SeqNo: 649804

Units: mg/Kg

LowLimit HighLimit

Analyte

Result

SPK value SPK Ref Val %REC

90.2

PQL

15.00

SPK value SPK Ref Val %REC LowLimit

%RPD

110

14

90

Chloride

1.5

Qual

Result

RPDLimit

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range Ε
- RSD is greater than RSDlimit 0 R RPD outside accepted recovery limits
- Spike Recovery outside accepted recovery limits

Analyte detected below quantitation limits

- Analyte detected in the associated Method Blank В
- Holding times for preparation or analysis exceeded Η Not Detected at the Reporting Limit
- Sample pH greater than 2.

ND

Reporting Detection Limit RL

Page 2 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

Qual

RPDLimit

1410A18 23-Oct-14

Client:

Blagg Engineering

Project:

Mudge LS #50

Sample ID MB-16029 SampType: MBLK TestCode: EPA Method 418.1: TPH Client ID: PBS Batch ID: 16029 RunNo: 22068 Prep Date: 10/22/2014 Analysis Date: 10/22/2014 SeqNo: 649209 Units: mg/Kg Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD Petroleum Hydrocarbons, TR ND

Sample ID LCS-16029 SampType: LCS TestCode: EPA Method 418.1: TPH Client ID: LCSS Batch ID: 16029 RunNo: 22068 Prep Date: 10/22/2014 Analysis Date: 10/22/2014 SeqNo: 649210 Units: mg/Kg SPK value SPK Ref Val **RPDLimit** Analyte Result PQL %REC LowLimit HighLimit %RPD Qual Petroleum Hydrocarbons, TR 110 20 100.0 110 80 120

Sample ID LCSD-16029 SampType: LCSD TestCode: EPA Method 418.1: TPH Client ID: LCSS02 Batch ID: 16029 RunNo: 22068 Prep Date: 10/22/2014 Analysis Date: 10/22/2014 SeqNo: 649211 Units: mg/Kg **PQL** SPK value SPK Ref Val %REC HighLimit %RPD **RPDLimit** Qual Analyte Result LowLimit 20 110 100.0 n 110 80 120 0 20 Petroleum Hydrocarbons, TR

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range Е
- Analyte detected below quantitation limits
- RSD is greater than RSDlimit 0
- RPD outside accepted recovery limits R
- Spike Recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank В
- Holding times for preparation or analysis exceeded Η
- ND Not Detected at the Reporting Limit
- Sample pH greater than 2.
- RLReporting Detection Limit

Page 3 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1410A18

23-Oct-14

Client:

Blagg Engineering

Mudge LS #50

Project: Mud	ge LS #50												
Sample ID MB-16008 M	K Samp	SampType: MBLK TestCode: EPA Method 8021B: Volatiles											
Client ID: PBS	Bato	:h ID: R2	2067	F	RunNo: 2	2067							
Prep Date:	Analysis I	Date: 10	0/22/2014	5	SeqNo: 6	49639	Units: mg/l	K g					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	ND	0.050											
Toluene	ND	0.050											
Ethylbenzene	ND	0.050											
Xylenes, Total	ND	0.10											
Surr: 4-Bromofluorobenzene	0.94		1.000		94.5	80	120						
Sample ID LCS-16008 N	IK Samp	Type: LC	s	Tes	tCode: E	PA Method	8021B: Vola	tiles					
Client ID: LCSS	Bato	h ID: R2	2067	F	RunNo: 2	2067							
Prep Date:	Analysis I	Date: 10)/22/2014	5	SeqNo: 6	49640	Units: mg/h	〈 g					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	0.99	0.050	1.000	0	99.1	80	120						
Toluene	1.0	0.050	1.000	0	99.9	80	120						
Ethylbenzene	1.0	0.050	1.000	0	102	80	120						
Xylenes, Total	3.0	0.10	3.000	0	101	80	120						
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120						
Sample ID MB-16008	Samp	Туре: МЕ	BLK	Tes	tCode: E	PA Method	8021B: Vola	tiles					
Client ID: PBS	Bato	h ID: 16	800	F	RunNo: 2	2067							
Prep Date: 10/21/2014	Analysis (Date: 10)/22/2014	5	SeqNo: 6	49641	Units: %RE	:C					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Bromofluorobenzene	0.94		1.000		94.5	80	120						
Sample ID LCS-16008	Samp	Type: LC	S	Tes	tCode: E	PA Method	8021B: Vola	tiles		-			
Client ID: LCSS	Bato	h ID: 16	800	F	RunNo: 2	2067							
Prep Date: 10/21/2014	Analysis (Date: 10)/22/2014	\$	SeqNo: 6	49642	Units: %RE	:C					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120						

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range Е
- Analyte detected below quantitation limits J
- RSD is greater than RSDlimit 0
- R RPD outside accepted recovery limits
- Spike Recovery outside accepted recovery limits S
- В Analyte detected in the associated Method Blank
- Holding times for preparation or analysis exceeded Н
- Not Detected at the Reporting Limit
- Sample pH greater than 2.
- RLReporting Detection Limit

Page 4 of 4



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

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

Sample Log-In Check List

Client Name: **BLAGG** Work Order Number: 1410A18 RcptNo: 1 Received by/datec Logged By: Ashley Gallego 10/22/2014 8:00:00 AM Completed By: Ashley Gallegos 10/22/2014 8:44:52 AM Reviewed By: Chain of Custody Yes 🗌 No 🗌 Not Present 1. Custody seals intact on sample bottles? No 🗌 2. Is Chain of Custody complete? Yes Not Present 3 How was the sample delivered? Courier Page 1 Log In No 🗌 NA 🗌 4. Was an attempt made to cool the samples? NA 🗆 No 🗌 5. Were all samples received at a temperature of >0° C to 6.0°C 6. Sample(s) in proper container(s)? 7. Sufficient sample volume for indicated test(s)? No 🗌 8. Are samples (except VOA and ONG) properly preserved? NA 🗆 No 🗷 9. Was preservative added to bottles? Yes 🗌 No 🗍 No VOA Vials 10. VOA vials have zero headspace? No 🗹 11. Were any sample containers received broken? Yes # of preserved bottles checked No 🗌 for pH: 12. Does paperwork match bottle labels? Yes (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No 🗌 13. Are matrices correctly identified on Chain of Custody? No \square 14. Is it clear what analyses were requested? No 🗆 Checked by: Yes 🐼 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 eMail Phone Fax In Person By Whom: Regarding: **Client Instructions:** 17. Additional remarks: 18. Cooler Information Cooler No Temp °C Condition Seal Intact | Seal No | Seal Date Signed By: Good 1.0

Chain-of-Custody Record			Turr-Around	SAME				HAL ENVIRONMENTA											TA	L	
Client:	BLAG	G ENGR.	/ BP AMERICA	☐ Standard	☑ Rush _	DAY														OR	
	 			Project Name:			5 S.				wwv										
Mailing Address: P.O. BOX 87				MUDGE LS	‡ 50		49	01 H									3 710 9)			
BLOOMFIELD, NM 87413			Project #:			1)5-34							-410					
Phone #: (505) 632-1199						4			12.7		ļ	hnal	ysis	Red	ues	it .					
email or Fa	ax#:			Project Manag	jer:									J.				T			
QA/QC Pac	-		Level 4 (Full Validation)		NELSON VI	ELEZ	8021B)	only)	(OHM)			lS)		°04,50	PCB's			er - 300.1)			0.
Accreditati	on:		,	Sampler:	NELSON VI	LEZ TIV	 *	(Gas		7	7	SIR		02,6	/ 8082			' water			m m
□ NELAP		□ Other		On ice	y j Yes		1	+ TPH (Gas	0/0	118.	92	3270		N,EC	8/s		Æ	-300.0/			e sai
□ EDD (T	ype)			Sample Temp	erature:			+ 4	GRC	po v	<u>8</u>	or	tals	3,N(cide	F	i-VC	il - 30	Ì	<u>e</u>	osit
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEALNO 1410AIS	BTEX +**	BTEX + MTBE	TPH 8015B (GRO / DRO	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil		Grab sample	5 pt. composite sample
10/21/14	1100	SOIL	5PC - TB @ 5' (95)	4 oz 1	Cool	-001	V			٧								7			V
																					\neg
							ļ													\neg	_
				· · · · · · · · · · · · · · · · · · ·														_			-
			RUN TPH 8015B IF TPH																	寸	
			418.1 > 2,500 mg/Kg				<u> </u>														
					<u> </u>																
·																				\dashv	
		<u> </u>									寸									一	
Date: 1/14	Time:	Relinquish	In J	Received by:	ulsho to	Date Time	BI		RECT	LY TO									<u></u> _	<u> </u>	<u>l</u>
Date: 10 22/14	Time:	Relinquish	ed by: Lat Dalta Submitted to Hall Environmental may be se	Received by:	10/0:	Date Time ORDO LIU HOO S. This serves as notice o	w	ork O	rder		N15	502	061		Pa	ykey	:Z	EVH			





BP America Production Company 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

October 20, 2014

Bureau of Land Management Mark Kelly 6251 College Blvd Suite A Farmington, NM 87402

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank

Well Name: MUDGE LS 050

API#: 3004523281

Dear Mr. Kelly,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about October 22, 2014. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at 505-326-9214

Sincerely,

Jerry Van Riper

9D Vaker

Surface Land Negotiator

BP America Production Company

BP America Production Company

200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US

October 10, 2014

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

MUDGE LS 050 API 30-045-23281 (F) Section 23 – T31N – R11W San Juan County, New Mexico

Dear Mr. Cory Smith:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95 bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around October 15, 2014.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Jeff Peace

BP Field Environmental Advisor

(505) 326-9479



