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

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.

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 #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Cole Gas Com A 1
API Number:3004508240OCD Permit Number:
U/L or Qtr/QtrKSection15Township29NRange9WCounty:San Juan
Center of Proposed Design: Latitude36.72178 Longitude107.76936 NAD: □1927 ⋈ 1983
Surface Owner: 🛮 Federal 🗌 State 🗎 Private 🗎 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 1 of 19.15.17.11 NMAC Tank B
Volume:21.0bbl Type of fluid:Produced water
Tank Construction material: Steel
Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _Single walled/double bottomed
Liner type: Thicknessmil
Alternative Method:

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

5. 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,	hospital				
institution or church)	поѕриш,				
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					
8. V					
<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: 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.					
9. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC <u>Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accept material are provided below.</u> 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				
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	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 					
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
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 19.1 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.	uments 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. and 19.15.17.13 NMAC □ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC 	15.17.9 NMAC
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Prayiously Approved Design (attach copy of design) - API Number: or Permit Number:	
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
Instructions: Each of the following items must be attached to the application. Please inacate, by a check mark in the box, that the attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.10 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	aocumenis are
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	attached to the
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 ☐ NA
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	☐ Yes ☐ No
Within a:100-year floodplain FEMA map	Yes No
16.	
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	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 believe	ef.
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: 1/5/2 OCD Permit Number:	2015
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 Method:	op systems only)

Oil Conservation Division Page 5 of 6

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure rebelief. I also certify that the closure complies with all applicable closure requirements.	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Jeff Resel	Date:December 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

Cole Gas Com A l BGT Tank B (21 bbl) API No. 3004508240 Unit Letter K, Section 15, T29N, R9W

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 BGT notice requirements at that time.
- 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 BGT notice requirements at that time.
- 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
	21 bbl BGT, Tank B	(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 BTEX, TPH 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 as part of final reclamation when the well is plugged and abandoned.

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 as part of final reclamation when the well is plugged and abandoned.

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 as part of final reclamation when the well is plugged and abandoned.

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 as part of final reclamation 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

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

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

Form C-141

Revised August 8, 2011

			Rele	ease Notifi	catio	n and Co	orrective A	etion			
						OPERA	ГOR	☐ In	itial Report	\boxtimes	Final Report
Name of Co						Contact: Jef					
		Court, Farm		M 87401			No.: 505-326-94				
Facility Nat	ne: Cole G	as Com A 1				Facility Typ	e: Natural gas	well			
Surface Ow	ner: Feder	al		Mineral (Owner:	Federal		API	No. 3004508	240	
				LOC	ATIO	N OF REI	LEASE				
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/West Lin	County: S	an Juan	
K	15	29N	9W	1,470	South		1,650	West			
		Lat	titude 3	36.72178		Longitud	le 107.76936				
						OF REL					
Type of Rele	ase: none			INA	LUKE	,	Release: N/A	Volum	Recovered: 1	N/A	
Source of Re		grade tank -	- 21 bbl, T	ank B			lour of Occurrence		d Hour of Dis		
Was Immedi		liven?			*	If YES, To					
			Yes _] No 🛛 Not R	equired						
By Whom?						Date and I-					
Was a Water	course Reac	hed?	Yes 🛭	1 No		If YES, Vo	olume Impacting t	the Watercourse.			
			· · · · · · · · · · · · · · · · · · ·	=		<u> </u>					
If a Watercou	ırse was İmp	pacted, Descr	ibe Fully.*	k							
				n Taken.* Sampli and chloride belo					al to ensure no	soil im	pacts from
						,					
Describe Are	a Affected a	nd Cleanup A	Action Tak	cen.* BGT was re	moved a	and the area u	nderneath the BG	T was sampled.	The area unde	er the B	GT was
				active well area.				•			
I hereby certi	fy that the in	nformation gi	ven above	is true and comp	lete to t	he best of my	knowledge and u	nderstand that p	rsuant to NM	OCD ru	iles and
				nd/or file certain r							
				ce of a C-141 report investigate and r							
				tance of a C-141							
federal, state,											
,	١	\circ					OIL CON	SERVATIO:	N DIVISIO	<u>)N</u>	
Signature:	Jeff N	asse	-								
organica.	XW "					Annroved by	Environmental S	necialist:			
Printed Name	: Jeff Peace					. ipproved by					
Title: Field E	nvironment	al Coordinato	r			Approval Dat	e:	Expiratio	n Date:		
1.0.0.1101012							·				
E-mail Addre	ss: peace.je	ffrey@bp.cor	n			Conditions of	`Approval:		Attached		
Date: Decem	ber 5, 2014		Phone	e: 505-326-9479							

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #:3004508240 TANK IDA & B
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER: 45 SW/DB REPLACED WITH 95 DW/DB	PAGE#: 1 of 1
SITE INFORMATION		DATE STARTED: 01/11/12
	29N RNG: 9W PM: NM CNTY: SJ ST: NM	DATE FINISHED:
05037004	O'W NE/SW LEASE TYPE: FEDERAL STATE / FEE / INDIAN ELKHORN PROD. FORMATION: MV CONTRACTOR: MBF - (J.POWELL)	ENVIRONMENTAL SPECIALIST(S): NJV
REFERENCE POINT		
1) 45 SW/DB (A)		ARING FROM WH.: 126', S68W
2) <u>21 SW/DB (B)</u>	GPS COORD.: 36.72178 X 107.76936 DISTANCE/BE	EARING FROM W.H.: 91', S10W
3)		EARING FROM W.H.:
	GPS COORD.: DISTANCE/BE	OVM
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL 1625 419.14	READING (ppm)
	SAMPLE DATE: 01/11/12 SAMPLETIME: 1635 LAB ANALYSIS: 418.1/	
	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION		
SOIL COLOR: COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST MOIST / WE SAMPLE TYPE: GRAB COMPOSITE # OF PTS. DISCOLORATION/STAINING OBSERVED:	OSE / FIRM DENSE / VERY DENSE T / SATURATED / SUPER SATURATED B HC ODOR DETECTED: YES NO EXPL	7 / FIRM / STIFF / VERY STIFF / HARD
ANY AREAS DISPLAYING WETNESS: YES NO ADDITIONAL COMMENTS: NO APPAREN IN WSW DIRECTION. SOIL IMPACT DIMENSION ESTIMATION:	T EVIDENCE OF A RELEASE FROM EITHER BGT. 45 BGT REPLACEMENT WILL BE SLIG	HTLY OFFSET ORIGINAL POSITION FIMATION (Cubic Yards): NA
DEPTH TO GROUNDWATER: >100' N	EAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: <1,000' NMOO	CD TPH CLOSURE STD: 1,000 ppm
SITE SKETCH	WELL A OWN	CALIB. READ. = NA ppm RF = 0.52
ACCESS ROAD	HEAD ⊕ N I	NA am/pm DATE: NA
SEP	1=	MISCELL. NOTES
45 (A)		WO - N1376842
PBGTL T.B. ~5.5'	-	PO - 55554
B.G.	PRCTI —	PK - ZVALENOLAB
	T.B. ~6' B.G.	PJ#-N/A
WOODEN R.W.] -	ermit date(s): 06/03/10
· 1		CD Appr. date(s): 08/24/11
DOWN	$ \left(\begin{array}{c} \left(\begin{array}{c} x \\ x \\ x \end{array}\right) \\ R.W. $ WOODEN R.W.	
✓ SLOPE ▼ DIRECTION	X - S.P.D.	
T.B. = TANK BOTTOM; PBGTL = PREVIOUS B	ATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW, T.H. = TEST HOLE; ~ = APPROX.; BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; SW-SINGLE WALL; DW-DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	BGT Sidewalls Visible:(Y)/ N / NA Alagnetic declination: 10° E
TRAVEL NOTES: CALLOUT:		

Analytical Report

Lab Order 1201387

Date Reported: 1/19/2012

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Cole GC A #1

Lab ID: 1201387-001

Project:

Client Sample ID: 5PC-TB@6; (21 BGT)

Collection Date: 1/11/2012 4:35:00 PM

Received Date: 1/13/2012 8:50:00 AM

Analyses	Result	RL Qu	ıal Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	E ORGANICS			,	Analyst: JMP
Diesel Range Organics (DRO)	ND	9.9	mg/Kg	1	1/18/2012 11:54:48 AM
Surr: DNOP	124	77.4-131	%REC	1	1/18/2012 11:54:48 AM
EPA METHOD 8015B: GASOLINE RA	NGE				Analyst: RAA
Gasoline Range Organics (GRO)	ND	4.8	rng/Kg	1	1/17/2012 6:20:06 PM
Surr: BFB	97.0	69.7-121	%REC	1	1/17/2012 6:20:06 PM
EPA METHOD 8021B: VOLATILES					Analyst: RAA
Benzene	ND	0.048	mg/Kg	1	1/16/2012 4:08:17 PM
Toluene	ND	0.048	mg/Kg	1	1/16/2012 4:08:17 PM
Ethylbenzene	ND	0.048	mg/Kg	1	1/16/2012 4:08:17 PM
Xylenes, Total	ND	0.095	mg/Kg	1	1/16/2012 4:08:17 PM
Surr: 4-Bromofluorobenzene	106	85.3-139	%REC	1	1/16/2012 4:08:17 PM
EPA METHOD 300.0: ANIONS					Analyst: BRM
Chloride	ND	7.5	mg/Kg	5	1/17/2012 3:59:45 PM
EPA METHOD 418.1: TPH			•		Analyst: JMP
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	1/17/2012

Matrix: SOIL

Qualifiers:

- Value exceeds Maximum Contaminant Level. */X
- Value above quantitation range
- Analyte detected below quantitation limits
- R RPD outside accepted recovery limits
- Spike Recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank
- Holding times for preparation or analysis exceeded Н
- Not Detected at the Reporting Limit
- Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1201387

19-Jan-12

Client:

Blagg Engineering

Project:

Cole GC A #1

Sample ID MB-304

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID: PBS

Batch ID: 304

RunNo: 426

%RPD

Prep Date:

1/17/2012

Analysis Date: 1/17/2012

SeqNo: 12343

Units: mg/Kg HighLimit

Analyte Chloride

PQL Result

SampType: LCS

TestCode: EPA Method 300.0: Anions

Sample ID LCS-304 Client ID: LCSS

Batch ID: 304

RunNo: 426

Prep Date: 1/17/2012

Analysis Date: 1/17/2012

SeqNo: 12344

Analyte

SPK value SPK Ref Val %REC LowLimit

Units: mg/Kg

%RPD **RPDLimit** Qual

PQL

SPK value SPK Ref Val

%REC

HighLimit 110

Chloride

90

14 1.5 15.00 0 93,4

Qualifiers:

Value exceeds Maximum Contaminant Level. */X

E Value above quantitation range

Analyte detected below quantitation limits J

RPD outside accepted recovery limits

В Analyte detected in the associated Method Blank

Н Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit Reporting Detection Limit

Page 2 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1201387

19-Jan-12

Client:

Blagg Engineering

Project:

Cole GC A #1

Sample ID MB-277

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID:

PBS

Batch ID: 277

PQL

20

RunNo: 408

Prep Date: 1/15/2012

Analysis Date: 1/17/2012

SeqNo: 12057

Units: mg/Kg

Qual

Analyte

Result

SPK value SPK Ref Val %REC LowLimit

HighLimit

%RPD **RPDLimit**

Petroleum Hydrocarbons, TR

ND

100

110

TestCode: EPA Method 418.1: TPH

%RPD

Sample ID LCS-277 Client ID: LCSS

SampType: LCS Batch ID: 277

RunNo: 408

87.8

87.8

LowLimit

Prep Date: 1/15/2012

Analysis Date: 1/17/2012

SeqNo: 12058 %REC

Units: mg/Kg

115

SPK value SPK Ref Val

HighLimit

RPDLimit Qual

Petroleum Hydrocarbons, TR

Sample ID LCSD-277

SampType: LCSD

TestCode: EPA Method 418.1: TPH

Client ID: LCSS02

Batch ID: 277

RunNo: 408

102

Units: mg/Kg

Analyte

Prep Date: 1/15/2012

Analysis Date: 1/17/2012 Result

20

SeqNo: 12059 SPK value SPK Ref Val %REC LowLimit

HighLimit

%RPD **RPDLimit** 4.45

Qual

Petroleum Hydrocarbons, TR

20

100.0

100.0

106

115

8.04

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E : Value above quantitation range

Analyte detected below quantitation limits RPD outside accepted recovery limits

Analyte detected in the associated Method Blank

Η Holding times for preparation or analysis exceeded ND Not Detected at the Reporting Limit

Page 3 of 6

Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1201387

19-Jan-12

Client:

Blagg Engineering

Project: Cole G	C A #1								
Sample ID MB-257	57 SampType: MBLK TestCode: EPA Method 8015B: Gasoline Range							9	
Client ID: PBS	Batch ID: 257	F	RunNo: 429						
Prep Date: 1/13/2012	Analysis Date: 1/17	//2012	9	SeqNo: 12	2419	Units: mg/K	ġ		
Analyte	Result PQL S	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND 5.0								
Sun: BFB	810	1,000		80.9	69.7	121			
Sample ID LCS-257	SampType: LCS		Tes	Code: EF	A Method	8015B: Gaso	line Rang	e '	
Client ID: LCSS	Batch ID: 257		F	RunNo: 42	29				
Prep Date: 1/13/2012	Analysis Date: 1/17	/2012	S	SeqNo: 12	2423	Units: mg/K	g		
Analyte	Result PQL S	PK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	27 5.0	25.00	0	109	86.4	132			
Surr::BFB	900	1,000		89.8	69.7	121			

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E! Value above quantitation range

I Analyte detected below quantitation limits

RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Detection Limit

Page 5 of 6

Hall Environmental Analysis Laboratory, Inc.

2.9

1.1

0.10

3.000

1.000

WO#:

1201387

19-Jan-12

Client:

Blagg Engineering

Project:

Xylenes, Total

Surr: 4-Bromofluorobenzene

Cole GC A #1

Sample ID MB-257	SampType: MBLK TestCode: EPA Method 8021B: Volatiles									
•	•	••								
Client ID: PBS	Batc	Batch ID: 257			RunNo: 4	11				
Prep Date: 1/13/2012	Analysis Date: 1/16/2012			5	SeqNo: 1	2116	Units: mg/F	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		102	85.3	139			
Sample ID LCS-257	Samp	ype: LC	S	Tes	tCode: El	PA Method	8021B: Vola	tiles	· · · · · · · · · · · · · · · · · · ·	
Client ID: LCSS	Batc	h ID: 25	7	F	RunNo: 4	11				
Prep Date: 1/13/2012	Analysis [Date: 1/	16/2012	5	SeqNo: 1	2119	Units: mg/H	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.95	0.050	1.000	0	95.4	83.3	107			
T-L	0.98	0.050	1.000	0	97.9	74.3	115			
Toluene	0.30	0.000	1.000	•	07.0	7.4.0				

96.4

105

85.2

85.3

123

139

Qualifiers:

Value exceeds Maximum Contaminant Level. */X

Value above quantitation range \mathbf{E}

Analyte detected below quantitation limits J

RPD outside accepted recovery limits R

Analyte detected in the associated Method Blank В

Η Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit ND

Reporting Detection Limit

Page 6 of 6



Hall Environmental Analysis Laboratory 4901 Hawkins NE

Albuquerque. NM 87105 TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

Sample Log-In Check List

Client N	lame:	BLAGG	•	• •	· We	ork Or	der I	Nümi	ber: ¯	1201387		•		
Logged	by:	Lindsay M	angin	1/13/2012 8:5	0:00 AM				0	tinaksy Hydysi tinaksy Hydysis				
Complet	ted By:	Lindsay M	angin	1/13/2012 12:	35:29 PM				19	timaky Hlapiyo				
Reviewe	ed By: عــ		1/12/12						<i>V</i> .					
Chain e	of Custo	<u>ody</u>	•											
1. We	re seals in	tact?				Yes		No		Not Present	✓			
2. Is Chain of Custody complete?							Y	No		Not Present				
3 How was the sample delivered?							<u>.x</u>							
Log In														
4. Coolers are present? (see 19. for cooler specific information)							✓ :	No		NA				
5. Was an attempt made to cool the samples?						Yes	~	No		NA				
6. Were all samples received at a temperature of >0° C to 6.0°						Yes	•	No		NA		•		
7 San	nple(s) in p	proper conta	ainer(s)?			Yes	~	No						
8. Suff								No						
9. Are	samples (except VOA	and ONG) proper	rly preserved?		Yes	v	No						
10. Was preservative added to bottles?						Yes		No	✓.	NA	•			
11 is th	ne headspa	ace in the V	OA vials less than	1/4 inch or 6 n	nm?	Yes		No		No VOA Viais	~			
			ers received broke			Yes		No	✓					
	13. Does paperwork match bottle labels? (Note discrepancies on chain of custody)						~	No		# of pre: bottles of for pH:		d		
14. Are	14. Are matrices correctly identified on Chain of Custody?						✓	No		,	(<2 or >	12 unles	s noted)
15. Is it	clear what	t analyses v	vere requested?	,		Yes	V	No		. Ad	djusted'	?		
	16. Were all holding times able to be met? (If no, notify customer for authorization.)						.✔.	No		. Ch	ecked I	by:		
Special	Handli	ng (if app	olicable)											
17, Was	s client not	ifie d of all c	liscrepancies with	this order?		Yes		No		NA	~			
	Person N	lotified:	The state of the s		Date:		MACTAL 4	1 14-144-04						
	By Whon	n:			Via:	e Mai	1	Ph	one	Fax In	Persor	1		
	Regardin	- 3												
	Client Ins	tructions:												
18. Addi	itional rem	arks:												
19. Coo	ler Inform	nation												
	ooler No	Temp ºC	Condition Se	al Intact Sea	I No Se	eal Da	te	:	Signe	ed By				
ļ ī	•	1.9	3000 res											

Chain-of-Custody Record				Turn-Around Time:				1	1 1	H	A		FI	w	TE	20	M	Å F	N'	TA		
Client: BLAGG ENGR. / BP AMERICA				☑ Standard ☐ Rush														-				
				Project Name:	ANALYSIS LABORATORY www.hallenvironmental.com																	
Mailing Address: P.O. BOX 87 BLOOMFIELD, NM 87413 Phone #: (505) 632-1199 email or Fax#:					4901 Hawkins NE - Albuquerque, NM 87109																	
				Project #:				Tel. 505-345-3975 Fax 505-345-4107														
								Analysis Request												इ.स.		
				Project Manager:					- 12 A	2 72												2° A
QA/QC Package: Standard Level 4 (Full Validation)			NELSON VELEZ			80218)	only)	TPH Method 8015B (Gas/Diesel)					PO4, SO4)	82 PCB's								
Accreditation:				Sampler: NELSON VELEZ デン			F F		+ TPH (Gas		_					102,						sample
□ NELAP □ Other				On Ice:	nice: ⊈Yes ⊡No					18.1)	4.1	F		3, 1	8	i '					e sa	2
□ EDD (Type)			Sample Temp	erature:	1.9	L.		1 80	d 41	92	Jr P/	als	Ž,	des	_	VOA	0.0		<u>e</u>	osit	ō <u>∠</u>	
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL·No. 1201387	BTEX +-MIT	BTEX + MTBE	TPH Metho	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F, Cl, NO3, NO2, PO4,	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	Chloride (300.0)		Grab sample	5 pt. composite	Air Bubbles (Y or N)
1/11/12	1635	SOIL	5PC-TB @ 6' (21 BGT)	4 oz 2	Cool	- 1	V		٧	٧								٧			٧	
														1				·				·
												7						T				
												_		-	-			:				
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	 												\dashv	\neg		\neg						
								-						+				· .			-	
																		1		\neg	1	
Date: //2//2	Time: Relinquished by:			Received by: Date Time				Remarks: TPH (8015B) - GRO & DRO ONLY. BILL DIRECTLY TO BP:														
Date:	Date: Time: Relinquished by:			Received by: Date Time Jeff Peace, 200 Energy Court, Farmington, NM 874							i											
1/2/12 1617 Christin Wre long			Work Order: N1376842 Paykey: ZVALENOLAB																			
-	If necess	ary, samples s	submitted to Hali Environmental may be s	subcontracted to other	accredited laboratorie	es. This serves as notice of	this po	idiaec	ity. Ar	ıy sub-	contre	icted d	eta wi	li be c	learly	notate	ed on t	the an	alytica	repor	it.	



