<u>District I</u>
1625 N. French Dr., Hobbs, NM 88240
<u>District II</u>
811 S. First St., Artesia, NM 88210
<u>District III</u>
1000 Rio Brazos Road, Aztec, NM 87410
<u>District IV</u>
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.

Pit, Below-Grade Tank, or

12491 Proposed Alternative Method Permit or Closure Plan Application CONS. DIV DIST. 3
Type of action: 45-24061 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:Atlantic B LS 24
API Number:3004524061OCD Permit Number:
U/L or Qtr/QtrNSection3 Township30N Range10W County:San Juan
Center of Proposed Design: Latitude36.836357 Longitude107.87291 NAD: □1927 ☒ 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment
2. □ 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
Selow-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
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) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify	hospital,
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other Monthly inspections (If netting or screening is not physically feasible)	
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC	4 ()
Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: 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. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptate are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells	Yes No
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 	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	Yes No
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
10. <u>Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist</u> : 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 do attached.	NMAC cuments are
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 19.15.17.12 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC) NMAC
Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19, and 19,15,17,13 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
11. Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached.	cuments are
Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC).15.17.9 NMAC
and 19.13.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the attached.	documents are
 ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Climatological Factors Assessment 	
Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC	
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Quality Control/Quality Assurance Construction and Installation Plan ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC	
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan ☐ Emergency Response Plan	
☐ Oil Field Waste Stream Characterization ☐ Monitoring and Inspection Plan ☐ Erosion Control Plan	
Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F Alternative	luid Management Pit
Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only)	
☐ On-site Closure Method (Only for temporary pits and closed-loop systems) ☐ In-place Burial ☐ On-site Trench Burial ☐ Alternative Closure Method	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15. Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ 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
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	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	
Within a 100-year floodplain.	☐ Yes ☐ No
- FEMA map	☐ 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 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. 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 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
17.	
Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and believe	ef.
Name (Print):	
Signature: Date:	 -
e-mail address: Telephone:	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	
OCD Representative Signature: Approval Date: Approval Date:	12015
1 Approving Sales	7 900(2
Title: Compliance Office OCD Permit Number:	
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:8/17/2011	
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)
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please incommark 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)	dicate, by a check
 ☐ Confirmation Sampling Analytical Results (if applicable) ☐ Waste Material Sampling Analytical Results (required for on-site closure) ☐ Disposal Facility Name and Permit Number ☐ Soil Backfilling and Cover Installation ☐ Re-vegetation Application Rates and Seeding Technique ☐ Site Reclamation (Photo Documentation) On-site Closure Location: Latitude 36.836357 Longitude -107.87291 NAD: ☐ 1927 	

Form C-144

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

Atlantic B LS 24 API No. 3004524061 Unit Letter N, Section 3, T30N, R10W

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	(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 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
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1000 Rio Brazos Road, Aztec, NM 87410
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

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

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

			Rele	ease Notific	atio	n and Co	rrective A	ction				
						OPERA	ΓOR	Initi	al Report Final Report			
Name of Co	mpany: B	Р				Contact: Jef	f Peace					
		Court, Farmi	ngton, N	M 87401		Telephone No.: 505-326-9479						
Facility Nar	ne: Atlant	ic B LS 24				Facility Type: Natural gas well						
Surface Ow	ner: Feder	al		Mineral O	wner:	Federal	0. 3004524061					
				LOCA	TIO	N OF REI	LEASE					
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/West Line	County: San Juan			
N	3	30N	10W	1,120	South		1,840	West				
	<u> </u>	Lati	tude36	5.836357		Longitud	e 107.87291_					
				NAT	URE	OF RELI	EASE					
Type of Relea	ase: none				-	Volume of	Release: N/A	Volume	Recovered: N/A			
		v grade tank –	21 bbl				our of Occurrenc	e: Date and	Hour of Discovery:			
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Requi						If YES, To	Whom?					
By Whom?						Date and H	our					
Was a Water	course Reac						lume Impacting t	he Watercourse.				
			Yes 🛚	No								
If a Watercou	rse was Im	pacted, Descri	be Fully.*	:								
				n Taken.* Samplin and chloride below					to ensure no soil impacts from			
				en.* BGT was ren the active well are		and the area u	nderneath the BG	T was sampled. T	he area underneath the BGT			
regulations al public health should their of or the environ	l operators or the envir perations h nment. In a	are required to comment. The ave failed to a	report an acceptance dequately CD accep	nd/or file certain re se of a C-141 report investigate and re	lease not by the mediat	otifications ar e NMOCD ma e contaminati	nd perform correctarked as "Final Recont that pose a three	tive actions for rel eport" does not rel eat to ground wate	suant to NMOCD rules and eases which may endanger lieve the operator of liability r, surface water, human health ompliance with any other			
	1 00	0	· · · · · · · · · · · · · · · · · · ·				OIL CONS	SERVATION	DIVISION			
Signature:	98 F	Peaces	レ									
Printed Name: Jeff Peace						Approved by Environmental Specialist:						
Title: Field E	nvironment	al Coordinato	r			Approval Dat	e:	Expiration	Date:			
E-mail Addre	ss: peace.je	effrey@bp.cor	n			Conditions of	Approval:		Attached			
Date: Decem	ber 22, 201	4	Pho	ne: 505-326-9479					_			

^{*} Attach Additional Sheets If Necessary

CHENT: BP	BLAGG ENGINEERING, INC.	API#: 3004524061
CLIENT: DF	P.O. BOX 87, BLOOMFIELD, NM 87413	TANK ID
	(505) 632-1199	(if applicble):
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE#: 1 of 1
SITE INFORMATION	I: SITE NAME: ATLANTIC B LS # 24	DATE STARTED: 08/08/11
QUAD/UNIT: N SEC: 3 TWP:		
1/4-1/4/FOOTAGE: 1,120'S / 1,84	10'W SE/SW LEASE TYPE: FEDERAL / STATE / FEE / INDIAN	ENVIRONMENTAL
	PROD. FORMATION: PC CONTRACTOR: ELKHORN	SPECIALIST(S): JCB
REFERENCE POINT	WELL HEAD (W.H.) GPS COORD.: 36.83643 X 107.8729	32 GL ELEV.: 6,337'
1) 21 BGT (SW/DB)	GPS COORD.: 36.836357 X 107.87291 DISTANCE	//BEARING FROM W.H.: 24', \$27E
2)	GPS COORD.: DISTANCE	/BEARING FROM W.H.:
3)	GPS COORD.: DISTANCE	JBEARING FROM W.H.:
4)	GPS COORD.: DISTANCE	
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL	OVM READING (ppm)
1) SAMPLEID: 21 BGT 5-pt. @	4' SAMPLE DATE: 08/08/11 SAMPLE TIME: 1113 LAB ANALYSIS: 41	8.1/8015/8021/300.0 (CI) 0.0
2) SAMPLE ID:	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
3) SAMPLE ID:	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION	SOIL TYPE: SAND / SILTY SAND SILT / SILTY CLAY / CLAY / GRAVEL /	OTHER
SOIL COLOR: DARK YE	LLOWISH ORANGE	
COHESION (ALL OTHERS): NON COHESIVE / SLIGHTL' CONSISTENCY (NON COHESIVE SOILS): LC		
MOISTURE: DRY/SLIGHTLYMOIST MOIST/W	ET / SATURATED / SUPER SATURATED HC ODOR DETECTED: YES NO EX	
SAMPLE TYPE: GRAB (COMPOSITE) #	OF PTS	
DISCOLORATION/STAINING OBSERVED	YES (NO) EXPLANATION -	
ANY AREAS DISPLAYING WETNESS: YES / NO	EXPLANATION -	
ADDITIONAL COMMENTS: NO APPARE DEPRESSION.	NT EVIDENCE OF A RELEASE OBSERVED FROM BGT. BGT RESTING ON CO	ONCRETE BLOCKS IN 20' X 20' X 3'
DEFRESSION.		
SOIL IMPACT DIMENSION ESTIMATION:		ESTIMATION (Cubic Yards) : NA
	EAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: <200' NM	MOCD TPH CLOSURE STD: 100 ppm
SITE SKETCH	PLOT PLAN circle: attached	OVM CALIB. READ. = <u>53.8</u> ppm RF = 0.52
	1 1	DVM CALIB. GAS = 100 ppm
	N L	IME: 11:25 @mpm DATE: 08/08/11
	'[MISCELL. NOTES
	WELL ⊕ HEAD	WO: N1411307
	(x x x) ← BERM	PO: 52606
	BERIN	PK: ZSCHWLLBGT PJ: Z2-00690-C
		13. 22-00030-0
	PBGTL T.B. ~ 6'	
	B.G.	Permit Date: 06/14/10
		Tank _ID
	X - S.P.D.	A BGT Sidewalls Visible: Y / N / NA
	'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;	BGT Sidewalls Visible: Y / N / NA Magnetic declination: 10° E
NA - NOT APPLICABLE OR NOT AVAILABLE	; SW-SINGLE WALL; DW-DOUBLE WALL; SB-SINGLE BOTTOM; DB-DOUBLE BOTTOM.	Magnetic declination: 10 E
TRAVEL NOTES: CALLOUT:	ONSITE: 08/08/11	

Hall Environmental Analysis Laboratory, Inc.

Date: 17-Aug-11 Analytical Report

CLIENT:

Blagg Engineering

Client Sample ID: 21 BGT 5-Point @-4'

Lab Order:

1108349

Collection Date: 8/8/2011 11:13:00 AM

Project:

Atlantic B LS 24

Date Received: 8/9/2011

Lab ID:

1108349-01

Matrix: SOIL

Analyses	Result	PQL Q	ual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	E ORGANICS	· · · · · · · · · · · · · · · · · · ·			Analyst: JB
Diesel Range Organics (DRO)	13	9.9	mg/Kg	1	8/11/2011 8:52:48 AM
Surr: DNOP	93.2	73.4-123	%REC	1	8/11/2011 8:52:48 AM
EPA METHOD 8015B: GASOLINE RA	NGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	8/12/2011 12:14:40 PM
Surr: BFB	96.9	75.2-136	%REC	1	8/12/2011 12:14:40 PM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.047	mg/Kg	1	8/12/2011 12:14:40 PM
Toluene	ND	0.047	mg/Kg	1	8/12/2011 12:14:40 PM
Ethylbenzene	ND	0.047	mg/Kg	1	8/12/2011 12:14:40 PM
Xylenes, Total	ND	0.093	mg/Kg	1	8/12/2011 12:14:40 PM
Surr: 4-Bromofluorobenzene	97.1	90.3-115	%REC	1	8/12/2011 12:14:40 PM
EPA METHOD 300.0: ANIONS					Analyst: SRM
Chloride	ND	7.5	mg/Kg	5	8/10/2011 7:29:25 PM
EPA METHOD 418.1: TPH					Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	8/10/2011

Qualifiers:

- Value exceeds Maximum Contaminant Level
- Estimated value
- Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits

Date: 17-Aug-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project: Atlantic B LS 24

Work Order:

1108349

Analyte	Result	Units	PQL	SPK Va S	SPK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: A Sample ID: MB-27980	nions	MBLK				Batch ID:	27980	Analysis	s Date:	8/10/2011 1:	2:31:32 PN
Chloride Sample ID: LCS-27980	ND	mg/Kg LCS	1.5			Batch ID:	27980	Analysis	s Date:	8/10/2011 1	2:48:56 PN
Chloride	14.41	mg/Kg	1.5	15	0	96.1	90	110			
Method: EPA Method 418.1: To Sample ID: MB-27982	PH	MBLK				Batch ID:	27982	Analysis	s Date:		8/10/201
Petroleum Hydrocarbons, TR Sample ID: LCS-27982	ND	mg/Kg LCS	20			Batch ID:	27982	Analysis	Date:		8/10/201
Petroleum Hydrocarbons, TR Sample ID: LCSD-27982	101.3	mg/Kg LCSD	20	100	0	101 Batch ID:	87.8 27982	115 Analysis	Date:		8/10/201
Petroleum Hydrocarbons, TR	105.3	mg/Kg	20	100	0	105	87.8	115	3.79	8.04	•
Method: EPA Method 8015B: E Sample ID: MB-27979		MBLK	10			Batch ID:	27979	Analysis	Date:	8/10/2011 1	1:05:33 AN
Diesel Range Organics (DRO) Sample ID: LCS-27979	ND	mg/Kg LCS				Batch ID:	27979	Analysis	Date:	8/10/2011 1	1:40:10 AN
Diesel Range Organics (DRO) Sample ID: LCSD-27979	44.19	mg/Kg LCSD	10	50	0	88.4 Batch ID:	66.7 27979	119 Analysis	Date:	8/10/2011 12	2:15:03 PM
Diesel Range Organics (DRO)	42.17	mg/Kg	10	50	0	84.3	66.7	119	4.67	18.9	
Method: EPA Method 8015B: 0 Sample ID: 1108349-01A MSD	Sasoline Rar	nge <i>MSD</i>				Batch ID:	27981	Analysis	Date:	8/11/2011	5:31:24 PM
Gasoline Range Organics (GRO) Sample ID: MB-27981	7.343	mg/Kg <i>MBLK</i>	1.0	5.102	0	144 Batch ID:	72.4 27 9 81	149 Analysis	128 Date:	19.2 8/11/2011	R 7:49:36 AM
Gasoline Range Organics (GRO) Sample ID: LCS-27981	ND	mg/Kg LCS	5.0			Batch ID:	27981	Analysis	Date:	8/11/2011 6	8:00:22 PM
Gasoline Range Organics (GRO) Sample ID: 1108349-01A MS	28.70	mg/Kg <i>MS</i>	5.0	25	0	115 Batch ID:	86.4 27981	132 Analysis	Date:	.8/11/2011 5	5:02:31 PM
Gasoline Range Organics (GRO)	33.58	mg/Kg	5.0	24.88	0	135	72.4	149			

Qualifiers:

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

E Estimated value

J Analyte detected below quantitation limits

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

Date: 17-Aug-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

Atlantic B LS 24

Work Order:

1108349

Analyte	Result	Units	PQL	SPK Va S	SPK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual .
Method: EPA Method 8021B: \	/olatiles										
Sample ID: 1108349-01A MSDB		MSD				Batch ID:	27981	Analys	sis Date:	8/11/2011 4	1:33:32 PN
Benzene	0.9674	mg/Kg	0.047	0.939	0	103	67.2	113	2.45	14.3	
Toluene	1.042	mg/Kg	0.047	0.939	0	111	62.1	116	1.23	15.9	
Ethylbenzene	1.079	mg/Kg	0.047	0.939	0	115	67.9	127	2.08	14.4	
Xylenes, Total	3.286	mg/Kg	0.094	2.817	0	117	60.6	134	2.41	12.6	
Sample ID: MB-27981		MBLK				Batch ID:	27981	Analys	is Date:	8/11/2011 7	7:49:36 AN
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: LCS-27981		LCS				Batch ID:	27981	Analys	is Date:	8/11/2011 10):14:03 AM
Benzene	0.9364	mg/Kg	0.050	1	0	93.6	83.3	107			
Toluene	1.012	mg/Kg	0.050	1	0	101	74.3	115			
Ethylbenzene	1.049	mg/Kg	0.050	1	0	105	80.9	122			
Xylenes, Total	3.140	mg/Kg	0.10	3	0	105	85.2	123			
Sample ID: 1108349-01A MSB		MS				Batch ID:	27981	Analys	is Date:	8/11/2011 4	1:04:34 PM
Benzene	0.9440	mg/Kg	0.049	0.974	0	96.9	67.2	113			
Toluene	1.055	mg/Kg	0.049	0.974	0	108	62.1	116			
Ethylbenzene	1.102	mg/Kg	0.049	0.974	0	113	67.9	127			
Xylenes, Total	3.366	mg/Kg	0.097	2.921	0	115	60.6	134			

R RPD outside accepted recovery limits

E Estimated value

J Analyte detected below quantitation limits

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG Work Order Number 1108349					ved:	8/9/2	2011
					by: MMG	/	
Checklist completed by: Signature	-ja:		8/c	Sample ID	labels checked t 	oy:	
Matrix:	Carrier name:	Grey	/hound	,			
Shipping container/cooler in good condition?		Yes	V	No 🗌	Not Present		
Custody seals intact on shipping container/cooler?		Yes	✓	No 🗌	Not Present	☐ Not S	Shipped 🗌
Custody seals intact on sample bottles?		Yes		No 🗌	N/A	$ \mathcal{L} $	
Chain of custody present?		Yes	y	No 🗌			
Chain of custody signed when relinquished and recei	ved?	Yes	\checkmark	No 🗆			
Chain of custody agrees with sample labels?		Yes	\checkmark	No 🗌			
Samples in proper container/bottle?		Yes	V	No 🗌			
Sample containers intact?		Yes	✓	No 🗀			
Sufficient sample volume for indicated test?		Yes	V	No 🗆			
All samples received within holding time?		Yes	V	No 🗀			umber of preserved
Water - VOA vials have zero headspace?	VOA vials subn	nitted	\checkmark	Yes 🗌	No 🗆		ottles checked for H:
Water - Preservation labels on bottle and cap match?	•	Yes		No 🗌	N/A ✓		
Water - pH acceptable upon receipt?		Yes		No 🗌	N/A 🗹		>12 unless noted
Container/Temp Blank temperature?		6.	1°	<6° C Accept	DW.		
COMMENTS:			If given sufficie	ent time to cool.		•	
			==:			====	
Client contacted Date	contacted:			Ρε	erson contacted		·
Contacted by: Rega	arding:						
Comments:						_	
						~	
Corrective Action							

С	Chain-of-Custody Record Turn-Around Time:							1.	JA			RIA.		<u> </u>	NI B		· Balti	· Fari				
Client:	BLAG	G ENG	WEERING INC.	Standard □ Rush				HALL ENVIRONMENTAL ANALYSIS LABORATORY														
	RP 1	\ MERV	٠ ٨	Project Name	e :			2	Č.	1					riron					`		•
Mailing	Address	: Pa	CA Box 87	ATLANT	rc BL	S 24			490	01 H	awki								109			
		Riccas	IELD, NM 87413	Project #:							5-34				-	-		-410				
Phone #			32-1199							100 (100 (100 (100 (100 (100 (100 (100	ALC: N. L. ALC: N. V.	S NEC Sec. O		H 34 - 104	- 020 1 t - 0	LANC MANAGEMENT		****	434 b 70-447			
email of		03 - 6.	324 (51)	Project Mana	ager:			· · · · · · · · · · · · · · · · · · ·	Ŕ			· Property		ويه اواده		90 XV2			Self Carl	2.84.34	n section.	1
	Package:		☐ Level 4 (Full Validation)		BLAGE T-BLAGE			TMB' s (8021)	TPH (Gas only)	(Gas/Diesel)					PO ₄ ,SO	PCB's	,	-				
Accredi	itation	□ Othe	r	Onice	AYes	⊿ No		+ TWB	+		18.1)	504.1)	AH)		ON'EC	s / 8082		(A)	,			or N)
	(Type)			Samplesten	perature >			H	HB.)d 8(od 4	od 5	P	etals	Ž	side	A)	-\C	30			Σ)
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	JEA	ENG SU/G	BTEX ###BE	BTEX + MTBE	TPH Method 8015B	TPH (Method 418.1)	EDB (Method	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,SO4)	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	CHLORIDE			Air Bubbles (Y or N)
3/3/11	1113	SOIL	ZIBGT S-POINT Q-4	402 X 1	cocc		-/	X		X	X			_ .					×			1
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Date: Zoll Date:	Time: 1206 Time: 1640	Relinquishe Relinquishe	1 Segg	Received by: Date Time Received by: Date Time Received by: Date Time Received by: Date Time Algebra 1346				Remarks: GRO + DRO ON BO15 OLD WORKER: N 1411307 PARKET: ZPEAT IDENV 46														
	f necessary,	samples sub	mitted to Hall Environmental may be sub	contracted to other a	ccredited laboratori	es. This serves		s possi	bility.	Any su	ıp-cou.	tracte	d data	will b	e clea	ly nota	ated or	n the a	nalytic	al repo	rt.	



