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 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	
12528 Propo	osed Alternative Method Permit or Closure Plan Appli	ication
Type of action:	Below grade tank registration	OIL CONS. DIV DIST. 3
45-22148	Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method	JAN 07 2015
	☐ Modification to an existing permit/or registration	
	Closure plan only submitted for an existing permitted or non-permitted	ed pit, below-grade tank,
or proposed alte	rnative 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.
I.
Operator: BP America Production Company OGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Florance C LS 15
API Number:3004521148 OCD Permit Number:9334
U/L or Qtr/Qtr H Section 19 Township 28N Range 8W County: San Juan
Center of Proposed Design: Latitude36.64900 Longitude107.71664 NAD: □1927 ⋈ 1983
Surface Owner: Federal State 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: Thicknessmil 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: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
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.

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)						
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)						
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. 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 accept	otable 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					
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No					
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ 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) - 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)	☐ Yes ☐ No					
 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).	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 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	
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 docattached. 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 NMAC 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 19.15.17.13 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	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 docattached. 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 19.15.17.10 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. 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	documents are
Closure Frair - based upon the appropriate requirements of Subsection C of 19.13.17.9 NiviAC and 19.13.17.15 NiviAC	
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 Flandstree 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	luid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a 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. P 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	
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	□ Vas □ Na
Within a 100-year floodplain. FEMA map	☐ Yes ☐ No ☐ 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 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 cann 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 believes	ief.
Name (Print): Title:	
Signature: Date:	
e-mail address:	
e-mail address:	
18. OCD Approval: ☐ Permit Application (including closure plan) ☑ Closure Plan (only) ☐ OCD Conditions (see attachment) OCD Representative Signature: ☐ Approval Date: ☐ OCD Conditions (see attachment)	the closure report.
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 199 Title: OCD Permit Number: OCD Permit Number: 199 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.	the closure report.

Form C-144

22.	
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 require	ments and conditions specified in the approved closure plan.
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
	Thic. I feld Environmental Cooldinator
Signature: Off Page	Date: January 6, 2015
organica.	
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

Florance C LS 15 API No. 3004521148 Unit Letter H, Section 19, T28N, R8W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
 - No notice was made due to misunderstanding of the 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	10

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
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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 ubmit 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 Notifi	catioi	n and Co OPERA	orrective A	ction	1 r.:41	1 D		E'1 D
Name of Company: BP					Contact: Jet			Initia	al Report		Final Rep	
A +						No.: 505-326-94	179					
						e: Natural gas						
				NC -1/		, , , ,			ADIN	2004521	1.40	
Surface Ow	ner: Feder	al		Mineral (API No	. 3004521	148	
T-14 T-44	G	т. 1:	D		_	N OF RE		D /W		0	Y Y	
Jnit Letter H	Section 19	Township 28N	Range 8W	Feet from the 1,840	North	South Line	Feet from the 990	East/Wes East	t Line	County: S	an Juan	
	-	Lat	itude3	6.64900		_ Longitud	e107.71664_					
				NAT	ΓURE	OF REL	EASE					
ype of Rele							Release: N/A			Recovered:		
		w grade tank –	- 21 bbl				lour of Occurrence	ce: D	ate and	Hour of Dis	scovery:	
Vas Immedi	ate Notice		Yes	No Not R	Required	If YES, To	Whom?					
By Whom?						Date and I	COLUMN TO THE PROPERTY OF THE					
Vas a Water	course Read		Yes 🗵	No		If YES, Volume Impacting the Watercourse.						
f a Waterco	urse was Im	pacted, Descr	ibe Fully *	k								
Describe Are	ea Affected	and Cleanup A	H, BTEX	and chloride belo	ow standa	ards. Analysi	the BGT was do s results are attac	hed.				
egulations a public health hould their or the enviro	Il operators or the envi operations has nment. In a	are required to ronment. The nave failed to a	o report ar acceptance adequately OCD accep	nd/or file certain to ce of a C-141 reprint investigate and in	release n ort by the remediat	otifications a e NMOCD m e contaminati	knowledge and und perform correct arked as "Final Roon that pose a three the operator of	ctive actions deport" does reat to groun	s for relations	eases which eve the ope , surface w	may enerator of ater, hun	danger liability nan health
,	100/	2					OIL CON	SERVA'	TION	DIVISIO	NC	
ignature:	Off 1	and										
	e: Jeff Peac	e				Approved by	Environmental S	pecialist:				
		tal Coordinato	or			Approval Da	e:	Exp	oiration l	Date:		
-mail Addr	ess: peace.j	effrey@bp.co	n			Conditions o	Approval:			Attached	1 🗌	
Date: Januar	ry 6, 2015		Phone:	505-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	P.O. BOX 87, BLC	GINEERING, INC. OOMFIELD, NM 87413	TANK ID
		632-1199	(if applicble):
FIELD REPORT:	(circle one): BGT CONFIRMATION / RE	LEASE INVESTIGATION / OTHER:	PAGE #:1 of1_
SITE INFORMATION	I: SITE NAME: FLORANC	E C LS #15	DATE STARTED: 06/11/12
QUAD/UNIT: H SEC: 19 TWP:	28N RNG: 8W PM: N	M CNTY: SJ ST: NM	DATE FINISHED:
1/4 -1/4/FOOTAGE: 1840'N / 990' LEASE#: NM03549		: FEDERAL/STATE/FEE/INDIA ELKHORN INTRACTOR: MBF-D. HARRIS	ENVIRONMENTAL LOD
REFERENCE POINT			
	GPS COORD.: 36.64		ANCE/BEARING FROM WH.: 21', N88E
2)			ANCE/BEARING FROM W.H.:
,		DIST	
,	GPS COORD.:		ANCE/BEARING FROM W.H.:
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LA		OVM READING
1) SAMPLE ID: 21 BGT 5-pt. @	_		(maa)
2) SAMPLE ID:			1
3) SAMPLE ID:			
4) SAMPLE ID:		SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION			
SOIL COLOR:	SOIL TYPE: SAND SILTY SAI	ND SILT / SILTY CLAY / CLAY / GRAVI	EL/OTHER
CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST / MOIST / W SAMPLE TYPE: GRAB COMPOSITE + DISCOLORATION/STAINING OBSERVED	ET / SATURATED / SUPER SATURATED FOR 5	HC ODOR DETECTED: YES NO): SOFT / FIRM / STIFF / VERY STIFF / HARD EXPLANATION -
ANY AREAS DISPLAYING WETNESS: YES NO APPARENT EVIDENCE OF A RELEASE CADDITIONAL COMMENTS:		N EXPLANATION :	
EXCAVATION DIMENSIONS (if applicable DEPTH TO GROUNDWATER: >100' N		ft. X NA ft. cubic EAREST SURFACE WATER: >1,000'	yards excavated (if applicable): NMOCD TPH CLOSURE STD: NMOCD TPH CLOSURE STD: 5,000 PPM
SITE SKETCH		PLOT PLAN circle: attached	OVM CALIB. READ. = 52.6 ppm RF = 0.52
			OVM CALIB. GAS = 100 ppm
		N	TIME: 3:35 an(pm) DATE: 06/11/12
	PBGTL TB ~ 6'		MISCELL. NOTES
	B.G.		wo: N661171
			PO#: 68625
	(X)		PK: ZBLACATIMC
\bigoplus	$\begin{pmatrix} x \\ x \\ x \end{pmatrix}$		PJ#:
WELL HEAD			OCD Appr. date(s): 12/15/11
			Tank Permit date(s): 12/14/11
			BGT Sidewalls Visible:(Y)/ N
		X - S.P.D	**
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BE	TON DEPRESSION; B.G. = BELOW GRADE; B = BELOV LOW-GRADE TANK LOCATION; SPD = SAMPLE POINT	N; T.H. = TEST HOLE; ~= APPROX.; I DESIGNATION; R.W. = RETAINING WALL;	BGT Sidewalls Visible: Y / N Magnetic declination: 10 E
TDAVEL NOTEO	W - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE	BOTTOM; DB - DOUBLE BOTTOM. ONSITE: 06/11/12	
TRAVEL NOTES: CALLOUT		ONISITE: UD/TT/Z	

revised: 04/10/12 BEI1005E-4.SKF

Analytical Report

Lab Order 1206512

Date Reported: 6/19/2012

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 21 BGT 5-point @ 6'

Project: Florance C LS 15

Collection Date: 6/11/2012 3:40:00 PM

Lab ID: 1206512-001

Matrix: SOIL

Received Date: 6/13/2012 10:00:00 AM

Analyses	Result	RL Qu	ual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE	ORGANICS				Analyst: JMP
Diesel Range Organics (DRO)	ND	9.8	mg/Kg	1	6/15/2012 11:15:56 AM
Surr: DNOP	117	77.6-140	%REC	1	6/15/2012 11:15:56 AM
EPA METHOD 8015B: GASOLINE RAN	GE				Analyst: RAA
Gasoline Range Organics (GRO)	9.7	4.8	mg/Kg	1	6/15/2012 7:50:00 PM
Surr: BFB	119	69.7-121	%REC	1	6/15/2012 7:50:00 PM
EPA METHOD 8021B: VOLATILES					Analyst: RAA
Benzene	ND	0.048	mg/Kg	1	6/15/2012 7:50:00 PM
Toluene	ND	0.048	mg/Kg	1	6/15/2012 7:50:00 PM
Ethylbenzene	ND	0.048	mg/Kg	1	6/15/2012 7:50:00 PM
Xylenes, Total	ND	0.095	mg/Kg	1	6/15/2012 7:50:00 PM
Surr: 4-Bromofluorobenzene	98.2	80-120	%REC	1	6/15/2012 7:50:00 PM
EPA METHOD 300.0: ANIONS					Analyst: BRM
Chloride	10	7.5	mg/Kg	5	6/18/2012 10:27:24 AM
EPA METHOD 418.1: TPH					Analyst: JMP
Petroleum Hydrocarbons, TR	ND	19	mg/Kg	1	6/18/2012

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

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

RL Reporting Detection Limit

U Samples with CalcVal < MDL

Page 1 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1206512

19-Jun-12

Client:

Blagg Engineering

Project:

Florance CLS 15

Sample ID MB-2426

SampType: MBLK

TestCode: EPA Method 418.1: TPH

TestCode: EPA Method 418.1: TPH

LowLimit

87.8

Client ID:

PBS

Batch ID: 2426

RunNo: 3496

Prep Date:

6/17/2012

Analysis Date: 6/18/2012

20

SeqNo: 98288

SPK value SPK Ref Val %REC LowLimit

Units: mg/Kg

HighLimit

RPDLimit Qual

Petroleum Hydrocarbons, TR Sample ID LCS-2426

Client ID: LCSS

SampType: LCS Batch ID: 2426

PQL

20

20

RunNo: 3496

Prep Date: Analyte

Analyte

Analyte

6/17/2012

Analysis Date: 6/18/2012

ND

SeqNo: 98292 %REC

Units: mg/Kg HighLimit

115

RPDLimit

Qual

Qual

Petroleum Hydrocarbons, TR

99

Result

TestCode: EPA Method 418.1: TPH

%RPD

%RPD

Sample ID LCSD-2426

Client ID: LCSS02

SampType: LCSD Batch ID: 2426

RunNo: 3496

Prep Date: 6/17/2012

Analysis Date: 6/18/2012

100

SeqNo: 98293

%REC

Units: mg/Kg

RPDLimit

Petroleum Hydrocarbons, TR

Result PQL

SPK value SPK Ref Val

100.0

SPK value SPK Ref Val

100.0

0

102

LowLimit

HighLimit

%RPD 3.86

8.04

Oualifiers:

Value exceeds Maximum Contaminant Level. */X

Value above quantitation range

Analyte detected below quantitation limits RPD outside accepted recovery limits

Analyte detected in the associated Method Blank

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit Reporting Detection Limit

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

Result

49

4.8

10

WO#:

1206512

19-Jun-12

Client:

Blagg Engineering

Project:

Analyte

Surr: DNOP

Diesel Range Organics (DRO)

Florance C LS 15

Sample ID MB-2387	SampType: MBLK	TestCode: EPA Method	8015B: Diesel Range Organics	
Client ID: PBS	Batch ID: 2387	RunNo: 3454		
Prep Date: 6/14/2012	Analysis Date: 6/15/2012	SeqNo: 96646	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD RPDLin	nit Qual
Diesel Range Organics (DRO)	ND 10			
Surr: DNOP	12 10.00	115 77.6	140	16
Sample ID LCS-2387	SampType: LCS	TestCode: EPA Method	8015B: Diesel Range Organics	
Client ID: LCSS	Batch ID: 2387	RunNo: 3454		
Prep Date: 6/14/2012	Analysis Date: 6/15/2012	SeqNo: 97001	Units: mg/Kg	

0

%REC

97.3

96.1

LowLimit

52.6

77.6

HighLimit

130

140

%RPD

RPDLimit

Qual

SPK value SPK Ref Val

50.00

5.000

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

R 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 LimitRL Reporting Detection Limit

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1206512

19-Jun-12

Client:

Blagg Engineering

Project:

Florance CLS 15

Sample ID MB-2369 Client ID: **PBS**

SampType: MBLK

TestCode: EPA Method 8015B: Gasoline Range

Batch ID: 2369

RunNo: 3471

Prep Date: 6/13/2012 Analysis Date: 6/15/2012

5.0

SeqNo: 97259

Units: mg/Kg

HighLimit

%RPD

RPDLimit Qual

Gasoline Range Organics (GRO) Surr: BFB

ND 940

Result

1000

1000

SPK value SPK Ref Val %REC

93.8

69.7

LowLimit

121

Sample ID LCS-2369

SampType: LCS

TestCode: EPA Method 8015B: Gasoline Range

Client ID: LCSS

Batch ID: 2369

RunNo: 3471

Prep Date: 6/13/2012 Analysis Date: 6/15/2012

SeqNo: 97263

113

101

Units: mg/Kg

Analyte Gasoline Range Organics (GRO) Surr: BFB

PQL 28 5.0

SPK value SPK Ref Val %REC 25.00 0 1000

98.5 69.7

LowLimit

HighLimit %RPD 133

121

RPDLimit Qual

Qualifiers:

Value exceeds Maximum Contaminant Level. */X

Value above quantitation range

Analyte detected below quantitation limits

RPD outside accepted recovery limits R

Analyte detected in the associated Method Blank В

Н Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Reporting Detection Limit

Page 4 of 5

Hall Environmental Analysis Laboratory, Inc.

2.9

1.0

0.10

3.000

1.000

WO#:

1206512

19-Jun-12

Client:

Blagg Engineering

Project:

Xylenes, Total

Surr: 4-Bromofluorobenzene

Florance C LS 15

Sample ID MB-2369	SampT	ype: ME	BLK	Tes											
Client ID: PBS	Batch	n ID: 23	69	F											
Prep Date: 6/13/2012	Analysis D	Analysis Date: 6/15/2012 SeqNo: 98203					Units: mg/Kg								
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	0.96		1.000		96.0	80	120								
Sample ID LCS-2369 SampType: LCS TestCode: EPA Method 8021B: Volatiles															
Client ID: LCSS	Batch ID: 2369 RunNo: 3471														
Prep Date: 6/13/2012	Analysis D	ate: 6/	15/2012	S	SeqNo: 9	8204	Units: mg/K	g							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual					
Benzene	1.0	0.050	1.000	0	103	83.3	107								
Toluene	0.99	0.050	1.000	0	99.3	74.3	115								
Ethylbenzene	0.96	0.050	1.000	0	95.8	80.9	122								

96.1

101

85.2

80

123

120

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

R 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

Page 5 of 5

RL Reporting Detection Limit



Hall Environmental Analysis Laboratory 4901 Havkins NE Albuquerque, NM 87105

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

Sample Log-In Check List

Client Name: BL	Work Order Number: 1206512																	
Received by/date:	A	5.1.1.																
Logged By: Lin	ndsay Mangin	06/13/2012 10:00:00 A	M		t	Junely	Allego											
Completed By: Lin	Completed By: Lindsay Mangin 6/13/2012 10:45:58						M Jones Harris											
Reviewed By:																		
Chain of Custody	170																	
 Were seals intac 	t? /		Yes		No		Not F	Present	V									
2. Is Chain of Custo	Is Chain of Custody complete?						Not F	Present										
3. How was the san	How was the sample delivered?																	
Log In																		
4. Coolers are present	4. Coolers are present? (see 19. for cooler specific information)					;		NA	ž									
5. Was an attempt	5. Was an attempt made to cool the samples?							NA										
6. Were all samples	Yes	~	No	1		NA												
7. Sample(s) in pro	Yes	~	No	9														
8 Sufficient sample volume for indicated test(s)?					No													
9. Are samples (exc	Yes	~	No	: :														
10. Was preservative added to bottles?					No	V		NA										
44 VOA viale havo a	zoro headenace?		Yes		No		No VO	A Vials	v									
11. VOA vials have a	e containers received brok	en?	Yes		No	~		// Viais										
13. Does paperwork			Yes	V	No			# of pres bottles of for pH:										
	rectly identified on Chain of	f Custody?	Yes	~	No		i	ioi pi i.	(<	2 or >12 ur	less noted)							
	nalyses were requested?		Yes	V	No		,	Ac	djusted?									
	times able to be met?		Yes	V	No			Ch	ecked by	y:								
Special Handling	(if applicable)	¥1																
17. Was client notifie	ed of all discrepancies with	this order?	Yes	1	No	٠		NA	✓									
Person Not	ified:	Date:	Section of the sectio	WANTANIA PAR				-										
By Whom:		Via:	eMa	ail .	. Ph	one	Fax	x !In	Person									
Regarding:			The said the related to a global property	100 100 m vm	************	~100 m//			labely are years many	Author other one on								
Client Instru	uctions:			M. Trabited Are Admira	US ASSALTA KARARINANI	1000000 No. 100000477			AL Ale Ale Ale Ale Ales Ales Ales Ales annue Area	denaming								
18. Additional remar	ks:																	
19. Cooler Informat	tion																	
	1 1	eal Intact Seal No	Seal Da	ate		Signe	ed By											
1 1.	.1 Good Ye	s			i													

Chain-of-Custody Record		Turn-Around Time:				HALL ENVIRONMENTAL															
Client: BLAGG ENGINEEONG INC.			Standard □ Rush					HALL ENVIRONMENTAL ANALYSIS LABORATORY													
7 P N			Project Name:																		
BP AMERICA Mailing Address: P.O. Box 87		FLORANCE C LS 15				www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109															
		Project #:				Tel. 505-345-3975 Fax 505-345-4107															
BLOWNFIELD, NM 87413						Analysis Request															
Phone #: 505-632-1199		Decised Manager					<u></u>				l lai) SIS	Neu	ues							
email or Fax#:		Project Manager:				only	ese					304	S						-		
QA/QC Package: ✓ Standard □ Level 4 (Full Validation)			J. BLAGE				(Gas	as/Di					PO4,5	PCB's							
Accredi	itation			Sampler: J	- BLAGG		图	PH	3 (G	_	=			102,	082						_
□ NELAP □ Other		On lice: Di Yes CI No				+	115E	18.	04.	AH)3,h	8/8		8				or N		
□ EDD (Type)		Sample Tem			H	BE	g 80	4 0	d 5	or P	tals	N,	ides	2	8	1.1			2		
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	Y HEALING	BTEX + WIBE + TWB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	3310 (PNA	RCRA 8 Me	Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	CHLOCIDE			Air Bubbles (Y
6/4/12	1540	SOIL	21 B67 5-POINT @ 6	402 X1	COOL	-001	X		X	X		ω	LL	4	ω	8	8	X	+	+	
																			\neg	+	\top
						* * * * * * * * * * * * * * * * * * * *			\neg		\dashv						\vdash		+	+	+
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		~ ~								\neg	_								_		+
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									\rightarrow	_	_								\perp	\perp	\perp
								•	\perp		_								\perp		L
Date:	Date: Time: Relinquished by:		Received by: Date Time				Remarks: GRO + DRO ON BOISB														
12/12	- 935 Jeft Blogg		Mastru Wooder 12/12 935				WO: NG6 1171														
Date:	Time:	Relinquishe	ed by:	Received by Pate Time				PK: ZBLACATIME													
12/12	liain !	Valo Mostra I. Da la		Telleral	COA	CONTACT: JEFF PEACE															
	necessary.	samples subr	mitted to Hall Environmental may be subc	ontracted to other ac	credited laboratorie	s. This serves as notice of this								clearly	v notat	ted on	the ar	nalvtica	al report		



