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

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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
12686 Proposed Alternative Method Permit or Closure Plan Application FCEIVED
Type of action: Below grade tank registration Permit of a pit or proposed alternative method FEB 18 2015 45.09291 Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration FEB 18 2015 Or proposed alternative method DISTINCTION 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.
Derator: BP America Production Company OGRID #: 778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Stewart LS 2
API Number: 3004509291OCD Permit Number: 4587
U/L or Qtr/Qtr MSection 20Township 30NRange 10WCounty: San Juan
Center of Proposed Design: Latitude36.79285 Longitude107.91224 NAD: □1927 ⊠ 1983
Surface Owner: 🛛 Federal 🗌 State 🗌 Prìvate 🗌 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
3.
Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
Volume:95.0bbl 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/single bottomed; side walls not visible
Liner type: Thickness mil 🗌 HDPE 🗌 PVC 🗋 Other
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, hospital, institution or church*)

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)

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

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.

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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks. **General siting** ☐ Yes ☐ No ☐ NA 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. NA NA NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance Yes No adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) Written confirmation or verification from the municipality; Written approval obtained from the municipality Within the area overlying a subsurface mine. (Does not apply to below grade tanks) Yes No Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division Within an unstable area. (Does not apply to below grade tanks) Yes No 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 **Below Grade Tanks** Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured Yes No 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 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, Yes No 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

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						
 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. 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 dot 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 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 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC 	cuments are					
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 dot attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.10 NMAC						
Previously Approved Design (attach copy of design) API Number: or Permit Number:						

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12. 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 Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance 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 19.15.17.9 NMAC and 19.15.17.13 NMAC	documents are			
13. 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 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 Method	luid Management Pit			
 14. Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC 				
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC <i>Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour</i> <i>provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. P</i> 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				
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				
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				
 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				
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.	Yes No				
- FEMA map					
 16. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved) Soil Cover Design - based upon the appropriate requirements of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of 19.15.17.13 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 beli	ief.				
Name (Print): Title:					
Signature: Date:					
e-mail address: Telephone:					
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)					
OCD Approval: Permit Application (including closure plan) OCD Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Ocd Plan (only) OCD Conditions (see attachment)					
OCD Approval: Permit Application (including closure plan) OCD Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: On and a closure plan) Approval Date: 3/19/12 Title: Ocd Permit Number: OCD Permit Number:					
OCD Approval: Permit Application (including closure plan) or Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 3/19/1 Title: OCD Permit Number: OCD Permit Number: 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.	2015				
OCD Approval: Permit Application (including closure plan) OCD closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:	2015				
OCD Approval: Permit Application (including closure plan) OCD closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 3/19/1 Title: OCD Permit Number: OCD Permit Number: 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.	the closure report. complete this				

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22. Operator Closure Certification:

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I hereby	r certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my know	vledge and
	I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan	

Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Jff Paaee	Date:February 17, 2015
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

Stewart LS 2 API No. 3004509291 Unit Letter M, Section 20, 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

- 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.
- 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

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
	95 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	0.0186
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.095
TPH	US EPA Method SW-846 418.1	100	12.8
Chlorides	US EPA Method 300.0 or 4500B	250 or background	20

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.

- BP shall notify the division District III office of its results on form C-141.
 C-141 is attached.
- 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 has been reclaimed since the well was plugged and abandoned.

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 has been reclaimed since the well was 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 has been reclaimed since the well was 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 has been reclaimed since the well was 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 since the well was 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.

Form C-141 Revised August 8, 2011

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.

1220 S. St. Francis Dr., Santa Fe, NM 87505		DI LOTA					
Sa	anta Fe	e, NM 875	05		and the second		
Release Notific	cation	and Co	orrective A	ction			
		OPERA	ГOR	🗌 Initi	al Report	\boxtimes	Final Repor
Name of Company: BP	Contact: Jef	f Peace					
Address: 200 Energy Court, Farmington, NM 87401		Telephone 1	No.: 505-326-94	79			
Facility Name: Stewart LS 2]	Facility Typ	e: Natural gas v	vell			
Surface Owner: Federal Mineral O)wner: I	Federal		APINO	. 3004509	291	
		N OF RE	FASE				
Unit Letter Section Township Range Feet from the	North/	South Line	Feet from the	East/West Line	County: S	an Juan	1
M 20 30N 10W 990	South		1,065	West			
Latitude36.79285		_ 0	e 107.91224				
	URE	OF REL				7/4	
Type of Release: none Source of Release: below grade tank – 95 bbl			Release: N/A lour of Occurrenc		Recovered: 1 Hour of Dis		
Was Immediate Notice Given?		If YES, To		e: Date and	Hour of Dis	covery	:
\square Yes \square No \square Not Re	equired	II 1 LS, 10	winoint?				
By Whom?		Date and H	Iour				
Was a Watercourse Reached?		If YES, Vo	olume Impacting t	he Watercourse.			
🗌 Yes 🖾 No							
Describe Cause of Problem and Remedial Action Taken.* Samplir the BGT. Soil analysis resulted in TPH, BTEX and chloride below					to ensure no	soil in	npacts from
Describe Area Affected and Cleanup Action Taken.* BGT was rer backfilled and compacted and has been reclaimed since the well w	vas plugg	ged and aban	doned.				
I hereby certify that the information given above is true and compl regulations all operators are required to report and/or file certain re public health or the environment. The acceptance of a C-141 repo should their operations have failed to adequately investigate and re or the environment. In addition, NMOCD acceptance of a C-141 r federal, state, or local laws and/or regulations.	elease no ort by the emediate	otifications as NMOCD m e contaminati	nd perform correc arked as "Final R on that pose a thr	tive actions for rel eport" does not rel eat to ground wate	eases which ieve the ope r, surface wa	may er rator of ater, hu	ndanger Fliability man health
			OIL CON	SERVATION	DIVISIO	DN	
Signature: off feare							
Printed Name: Jeff Peace	1	Approved by	Environmental S	pecialist:			
Title: Field Environmental Coordinator	1	Approval Da	te:	Expiration	Date:		
E-mail Address: peace.jeffrey@bp.com	(Conditions o	f Approval:		Attached		
Date: February 17, 2015 Phone: 505-326-9479							

* Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGIN P.O. BOX 87, BLOO (505) 632	MFIELD, NM 8741	3	API#: 3004509291		
FIELD REPORT:	BGT CONFIRMATION / TEMP. F (other)	BGT CONFIRMATION TEMP. PIT CLOSURE / RELEASE INVESTIGATION other)				
QUAD/UNIT: M SEC: 20 TW	SITE NAME: STEWAR P: 30N RNG: 10W PM: NN			DATE STARTED: 12/09/09 DATE FINISHED:		
	065'W SW/SW LEASE TYPE PROD. FORMATION: PC C	Received and a second se	INDIAN	ENVIRONMENTAL SPECIALIST: JCB		
2) 3) 4)	GPS COORD.: GPS COORD.: GPS COORD.:	285 X 107.91224	DISTANCE/BE DISTANCE/BE DISTANCE/BE DISTANCE/BE	251 GL ELEV.: 6,171' ARING FROM W.H.: 135', N47E ARING FROM W.H.:		
LAB INFORMATION:	CHAIN OF CUSTODY REC	ORD(S): 853	3			
 SAMPLE ID:	7' SAMPLE DATE: 12/09/09 SAMPLE DATE:	SAMPLE TIME: 1340 SAMPLE TIME: SAMPLE TIME:	LAB ANALYSIS: LAB ANALYSIS: LAB ANALYSIS:			
5) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:			
SOIL COLOR: DARK Y COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / C DENSITY (COHESIVE CLAYS & SILTS): SOFT MOISTURE: DRY / SLIGHTLY MOIST MOIST / W ADDITIONAL COMMENTS: 95 bbl B	OSE / FIRM DENSE / VERY DENSE COHESINE / MEDIUM PLASTIC / HIGHLY PLASTIC / FIRM / STIFF / VERY STIFF / HARD ET / SATURATED / SUPER SATURATED	HC ODOR DETECTED: YE	ES <u>NO</u> EXPL	# OF PTS. 5		
EXCAVATION DIMENSIONS (if applicable): NA ft. X NA	ft. X NA ft.	cubic vards ex	cavated (if applicable): NA		
SITE SKETCH	WOODEN RW $14'$ x x $14'$ x x x $14'$ x	PBGTL T.B. ~ 7' B.G.	N	PLOT PLAN circle: Attached MISCELL. NOTES SW - SINGLE WALLED SB - SINGLE BOTTOM		
	TON DEPRESSION; B.G. = BELOW GRADE; B = BEL	OW; T.H. = TEST HOLE; ~ = APPROX.;	S.P.D.			
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BE TRAVEL NOTES: CALLOUT:	ELOW+GRADE TANK LOCATION; SPD = SAMPLE PO	INT DESIGNATION; R.T. = RETAINING WALL. ONSITE: 09/04/08				

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EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5pt @ 7'	Date Reported:	12-15-09
Laboratory Number:	52679	Date Sampled:	12-09-09
Chain of Custody No:	8533	Date Received:	12-11-09
Sample Matrix:	Soil	Date Extracted:	12-14-09
Preservative:	Cool	Date Analyzed:	12-14-09
Condition:	Intact	Analysis Needed:	TPH-418.1
			Det.
	Conce	entration	Limit
Parameter	(mg	/kg)	(mg/kg)
Total Petroleum Hydrocar	bons 12	.8	11.6

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Stewart LS 2

Analyst

Muster Waters Review



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics **Total Petroleum Hydrocarbons**

Client: Sample ID; Laboratory Number: Chain of Custody No: Sample Matrix: Preservative: Condition:	Blagg/BP 95 BGT 5-pt @ 7' 52679 8533 Soil Cool Intact	Project #: Date Reported: Date Sampled: Date Received: Date Extracted: Date Analyzed: Analysis Requested:	94034-0010 12-16-09 12-09-09 12-11-09 12-14-09 12-15-09 8015 TPH
Parameter		Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5	- C10)	ND	0.2
Diesel Range (C10 -	C28)	ND	0.1
Total Petroleum Hyd	rocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, References: SW-846, USEPA, December 1996.

Comments: Stewart LS 2

Analyst

Mister milaeters Review

5796 US Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 lab@envirotech-inc.com envirotech-inc.com

envirotech Analytical Laboratory

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Blagg/BP	Project #:	94034-0010
95 BGT 5-pt @ 7'	Date Reported:	12-16-09
52679	Date Sampled:	12-09-09
8533	Date Received:	12-11-09
Soil	Date Analyzed:	12-15-09
Cool	Date Extracted:	12-14-09
Intact	Analysis Requested:	BTEX
	95 BGT 5-pt @ 7' 52679 8533 Soil Cool	95 BGT 5-pt @ 7'Date Reported:52679Date Sampled:8533Date Received:SoilDate Analyzed:CoolDate Extracted:

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)		
Benzene	18.6	0.9		
Toluene	17.4	1.0		
Ethylbenzene	14.9	1.0		
p,m-Xylene	27.3	1.2		
o-Xylene	16.8	0.9		
Total BTEX	95.0			

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	92.1 %
	1,4-difluorobenzene	96.0 %
	Bromochlorobenzene	97.0 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846. USEPA, December 1996.

Comments: Stewart LS 2

Analyst

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Chloride

	Concentration (mg/Kg)				
Intact	Chain of Custody:	8533			
Cool	Date Analyzed:	12-15-09			
Soil	Date Received:	12-11-09			
52679	Date Sampled:	12-09-09			
95 BGT 5pt @7'	Date Reported:	12-15-09			
Blagg/BP	Project #:	94034-0010			
	95 BGT 5pt @7' 52679 Soil Cool	95 BGT 5pt @7'Date Reported:52679Date Sampled:SoilDate Received:CoolDate Analyzed:IntactChain of Custody:			

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments:

Stewart LS 2

Analyst C

Anistrum Welles Review



EPA METHOD 418.1 TOTAL PETROLEUM HYROCARBONS QUALITY ASSURANCE REPORT

Client: Sample ID: Laboratory Numbe Sample Matrix: Preservative: Condition:	r:	QA/QC QA/QC 12-14-TPH.QA/0 Freon-113 N/A N/A	QC 52676	Project #: Date Reported Date Sampled Date Analyzed Date Extracted Analysis Need	: : #:	N/A 12-15-09 N/A 12-14-09 12-14-09 TPH
Calibration	I-Cal Date 12-11-09	C-Cal Date 12-14-09	I-Cal RF: 1,610	C-Cal RF: 1,650	% Difference 2.5%	Accept. Range +/- 10%
Blank Conc. (m TPH	ig/Kg)		Concentration ND		Detection Lim 11.6	it -
Duplicate Cond TPH	:. (mg/Kg)		Sample 15.4	Duplicate 12.8	% Difference 16.9%	Accept. Range +/- 30%
Spike Conc. (m TPH	g/Kg)	Sample 15.4	Spike Added 2,000	Spike Result 1,800	% Recovery 89.3%	Accept Range 80 - 120%

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: QA/QC for Samples 52676 - 52679.

Analyst

hristing Walters



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC		Project #:		N/A
Sample ID:	12-15-09 QA/0	QC	Date Reported:		12-16-09
Laboratory Number:	52676		Date Sampled:		N/A
Sample Matrix:	Methylene Chlor	ide	Date Received:		N/A
Preservative:	N/A		Date Analyzed:		12-15-09
Condition:	N/A		Analysis Reque	sted:	TPH
			, , , , , ,		
	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	9.9527E+002	9.9567E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.6625E+002	9.6664E+002	0.04%	0 - 15%
Blank Conc. (mg/L - mg/Kg)	的过去式 建丁酸 医丁酸	Concentration	四月 常用来来。	Detection Limit	
Gasoline Range C5 - C10		ND		0.2	
Diesel Range C10 - C28		ND		0.1	
Total Petroleum Hydrocarbons		ND		0.2	
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept Range	
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%	
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%	
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	ND	250	247	98.8%	75 - 125%
Diesel Range C10 - C28	ND	250	271	108%	75 - 125%
7					

ND - Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 52676, 52679 - 52684, 52698, and 52699.

Analyst

Muster m Walters



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client: Sample ID: Laboratory Number: Sample Matrix: Preservative: Condition:	N/A 12-15-BT QA/QC 52676 Soil N/A N/A		Project #: Date Reported: Date Sampled: Date Received: Date Analyzed: Analysis:		N/A 12-16-09 N/A N/A 12-15-09 BTEX
Calibration and	I-Cal RF:	C-CaLRF:	%Diff,	Blank	Detect.
Detection Limits (ug/L)		Accept Ran	ige 0 - 15%	Conc	Limit
Benzene	1.4410E+006	1 4439E+006	0.2%	ND	0.1
Toluene	1.3463E+006	1.3490E+006	0.2%	ND	0.1
Ethylbenzene	1.2247E+006	1.2272E+006	0.2%	ND	0.1
p,m-Xylene	3.1183E+006	3.1246E+006	0.2%	ND	0.1
n-Xylene	1.1654E+006	1.1677E+006	0.2%	ND	0.1
Duplicate Conc. (ug/Kg) Benzene Toluene Ethylbenzene p,m-Xylene o-Xylene	Sample ND ND ND ND ND	Duplicate ND ND ND ND ND	%Diff. 0.0% 0.0% 0.0% 0.0% 0.0%	Accept Range 0 - 30% 0 - 30% 0 - 30% 0 - 30% 0 - 30%	0.9 1.0 1.0 1.2 0.9
Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	50.0	52.2	104%	39 - 150
Toluene	ND	50.0	46.9	93.8%	46 - 148
Ethylbenzene	ND	50.0	47.5	95.0%	32 - 160
p,m-Xylene	ND	100	97.5	97.5%	46 - 148
o-Xylene	ND	50.0	48.7	97.4%	46 - 148

ND - Parameter not detected at the stated detection limit

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996. Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using

Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996

Comments:

QA/QC for Samples 52676, 52679, and 52681 - 52684.

Analyst

Mistin mulater Review

References:

CHAIN OF CUSTODY RECORD

Client: Project Name / Location: ANALYSIS / PARAMETERS BLACE/BP STEWART LS Z Sampler Name: Client Address: BTEX (Method 8021) VOC (Method 8260) TPH (Method 8015) J- BLAGG RCRA 8 Metals TCLP with H/P Cation / Anion Client No.: Sample Intact Client Phone No .: TPH (418.1) Sample Cool CHLORIDE 94034 - 0010 No./Volume Preservative Sample No./ Sample Sample Sample PAH RCI Lab No. Containers HgCl₂ HCl Identification Date Time Matrix 12/9/0 1340 52679 95 BET Sludge Soil) × × L 1-402 X 5-De @ 7-× 4 Solid Aqueous Soil Sludge Solid Aqueous Relinquished by: (Signature) Received by: (Signature) Date Time Date Time 12/11/09 Relinguished by: (Signature) 12/11/09 1417 1417 Received by: (Signature) Relinquished by: (Signature) Received by: (Signature) envirotech Analytical Laboratory 5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com

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