

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
12719 Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
45-07723 ☐ 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.

1.
Operator: ConocoPhillips Company OGRID #: 217817
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: Helen Jackson 2
API Number: 30-045-07723 OCD Permit Number: _____
U/L or Qtr/Qtr A (NENE) Section 33 Township 29N Range 9W County: San Juan
Center of Proposed Design: Latitude 36.687301°N Longitude 107.78157°W NAD: ☒ 1927 ☐ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment *NMOCD Determined coordinates to

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 _____
be 36.68737N 107.78256W NAD 83

3.
☒ Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: Produced Water
Tank Construction material: Metal
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness 45 mil ☐ HDPE ☐ PVC ☒ Other LLDPE

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)

7.

Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☒ Signed in compliance with 19.15.16.8 NMAC

8.

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 acceptable 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
☐ NA

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
☒ NA

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 300 feet 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.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (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 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC 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 documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

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 documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ 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

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 Fluid Management Pit
☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

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.

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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

On-Site Closure Plan Checklist: (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. 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 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H 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 belief.

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 Representative Signature: Jonathan D. Kelly Approval Date: 3/24/2015

Title: Compliance Officer 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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 11/24/14

20.

Closure Method:

- ☐ Waste Excavation and Removal ☒ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.

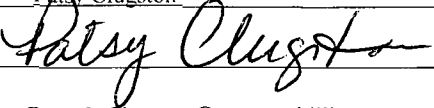
Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude °N Longitude °W NAD: ☐ 1927 ☐ 1983

Operator Closure Certification:

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

Name (Print): Patsy Clugston Title: Staff Regulatory Technician
Signature:  Date: 3-3-15
e-mail address: Patsy.L.Clugston@conocophillips.com Telephone: 505-326-9518

ConocoPhillips Company
San Juan Basin
Below Grade Tank Closure Report

Lease Name: Helen Jackson #2

API No.: 30-045-07723

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

1. COPC shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do 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, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**
3. COPC shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

4. COPC Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

5. If there is any on-site equipment associated with a below-grade tank, then COPC shall remove the equipment, unless the equipment is required for some other purpose.

All on-site equipment associated with the below-grade tank was removed.

6. COPC will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If COPC or the division determines that a release has occurred, then COPC shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then COPC shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
- Operator's name
 - Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

11. The surface owner shall be notified of COPC's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. COPC Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative

approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material; with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation **(See Report)**
 - Re-vegetation application rates and seeding techniques **(See Report)**
 - Photo documentation of the site reclamation **(Included as an attachment)**
 - Confirmation Sampling Results **(Included as an attachment)**
 - Proof of closure notice **(Included as an attachment)**

Clugston, Patricia L

From: Journey, Denise D
Sent: Wednesday, May 07, 2014 1:46 PM
To: 'Kelly, Mark'
Cc: Powell, Brandon, EMNRD; Kelly, Jonathan, EMNRD
Subject: Helen Jackson #2. BGT Closure 72 hour notification

Subject: HELEN JACKSON #2

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name: Helen Jackson #2

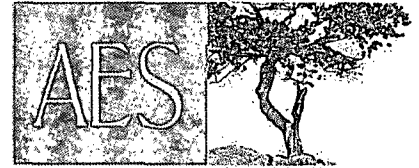
API#: 30-045-07723

Location: UL "A", Sec. 33, T29N, R9W

Footages: 1190' FNL & 1265' FEL

Operator: COP **Surface Owner:** BLM

Denise Journey
Regulatory Technician
ConocoPhillips Company
505-326-9556
505-215-1750
Denise.Journey@conocophillips.com



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche
Farmington, NM 87401
505-564-2281

Durango, Colorado
970-403-3084

June 24, 2014

Lindsay Dumas
ConocoPhillips
San Juan Business Unit
Office 214-07
5525 Hwy 64
Farmington, New Mexico 87401

Via electronic mail to: SJBUE-Team@ConocoPhillips.com

**RE: Below Grade Tank Closure Report
Helen Jackson #2
San Juan County, New Mexico**

Dear Ms. Dumas:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Helen Jackson #2, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – Helen Jackson #2

Legal Description – NW¼ NE¼, Section 33, T29N, R9W, San Juan County, New Mexico

Well Latitude/Longitude – N36.68733 and W107.78242, respectively

BGT Latitude/Longitude – N36.68737 and W107.78256, respectively

Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, May 2014

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 20 based on the following factors:

- **Depth to Groundwater:** Based on elevation, topographic interpretation and visual reconnaissance, depth to groundwater is interpreted to be greater than 100 feet below ground surface (bgs). (0 points)
- **Wellhead Protection Area:** The tank location is not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** Unnamed washes which ultimately discharge to Canyon Largo are located approximately 136 feet northeast and 183 feet southeast of the location. (20 points)

1.3 BGT Closure Assessment

AES was initially contacted by Doyle Clark, CoP representative, on May 12, 2014, and on the same day, Deborah Watson of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On May 12, 2014, AES personnel collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and analysis of total petroleum hydrocarbons (TPH). Soil sample SC-1 was field screened for VOCs and chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Sampling

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per U.S. Environmental Protection Agency (USEPA) Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per USEPA Method 8021B;
- TPH for gasoline range organics (GRO) and diesel range organics (DRO) per USEPA Method 8015D; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 0.1 ppm in S-3 and SC-1 up to 1.0 ppm in S-5. Field TPH concentrations ranged from less than 20.0 mg/kg in S-4 and S-5 up to 32.9 mg/kg in S-3. The field chloride concentration in SC-1 was 60 mg/kg. Field sampling results are summarized in Table 1 and presented on Figure 2. The AES Field Sampling Report is attached.

Table 1. Soil Field Sampling VOCs, TPH, and Chloride Results
Helen Jackson #2 BGT Closure, May 2014

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>TPH 418.1 (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
NMOCD Action Level (NMAC 19.15.17.13E)			--	100	250
S-1	5/12/14	0.5	0.5	23.9	NA
S-2	5/12/14	0.5	0.3	20.1	NA
S-3	5/12/14	0.5	0.1	32.9	NA
S-4	5/12/14	0.5	0.2	<20.0	NA
S-5	5/12/14	0.5	1.0	<20.0	NA
SC-1	5/12/14	0.5	0.1	NA	60

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.030 mg/kg and 0.149 mg/kg, respectively. TPH concentrations as GRO and DRO were reported at less than 3.0 mg/kg and 9.9 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. The laboratory analytical report is attached.

Table 2. Soil Laboratory Analytical Results
Helen Jackson #2 BGT Closure, May 2014

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action Level (NMAC 19.15.17.13E)			0.2	50	100		250
SC-1	5/12/14	0.5	<0.030	<0.149	<3.0	<9.9	<30

NA - not analyzed

3.0 Conclusions and Recommendations

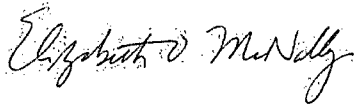
NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentration reported in S-3 with 32.9 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the Helen Jackson #2.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,



Emilee Skyles
Staff Geologist



Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, May 2014
AES Field Sampling Report 051214
Hall Analytical Report 1405485

C:\Users\emcnally.AES\Dropbox (Animas Environmental)\0000 Animas Server Dropbox EM\2014
Projects\ConocoPhillips\Helen Jackson #2\Helen Jackson #2 BGT Closure Report 062414.docx

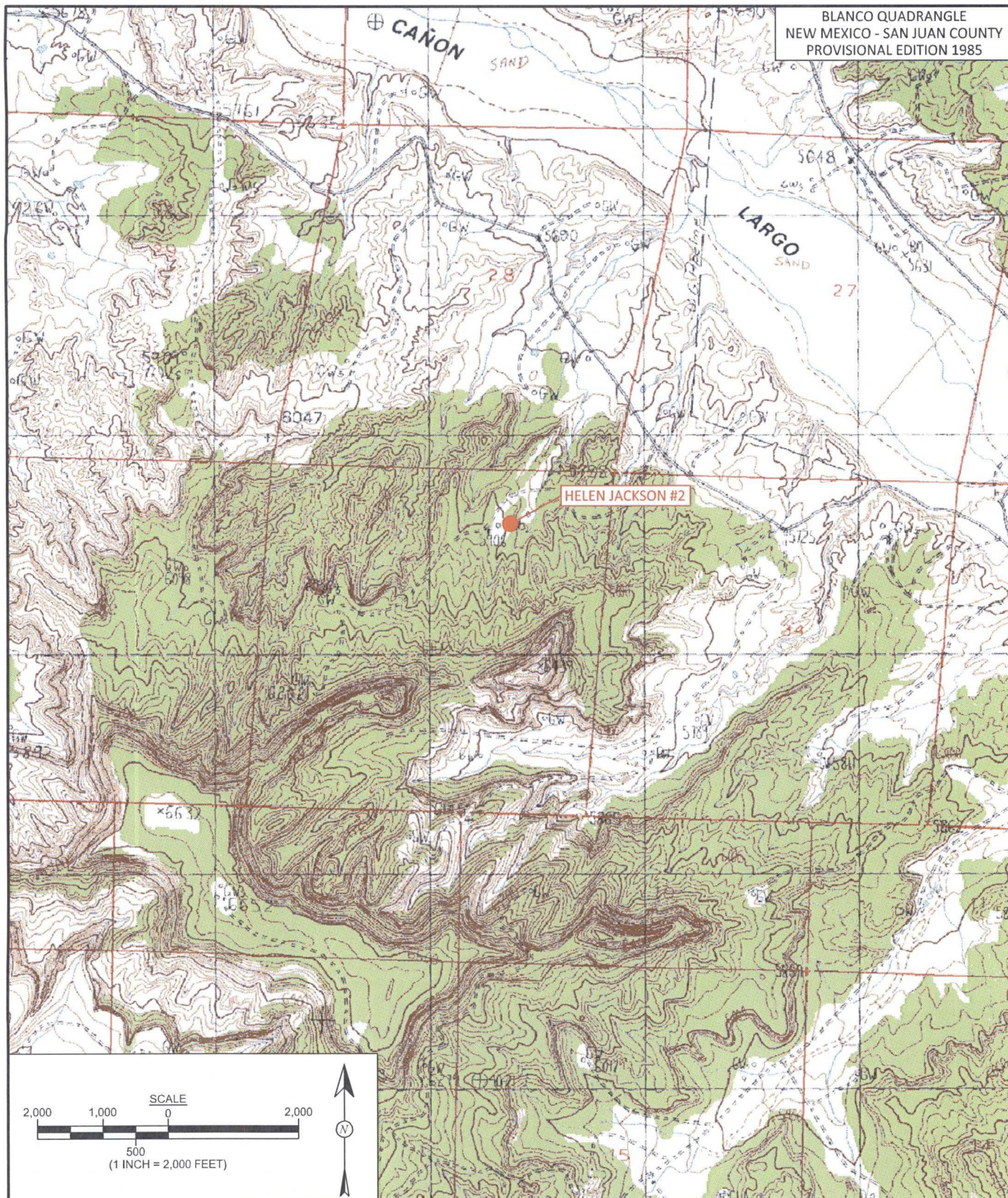
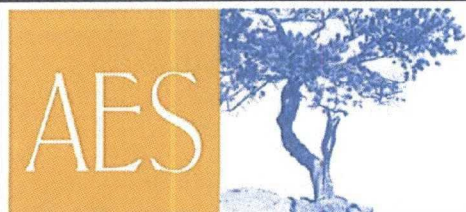


FIGURE 1

TOPOGRAPHIC SITE LOCATION MAP

ConocoPhillips
HELEN JACKSON #2
NW¼, NE¼, SECTION 33, T29N, R9W
SAN JUAN COUNTY, NEW MEXICO
N36.68733, W107.78242



Animas Environmental Services, LLC

DRAWN BY: S. Glasses	DATE DRAWN: May 12, 2014
REVISIONS BY: C. Lameman	DATE REVISED: May 12, 2014
CHECKED BY: D. Watson	DATE CHECKED: May 12, 2014
APPROVED BY: E. McNally	DATE APPROVED: May 12, 2014

LEGEND

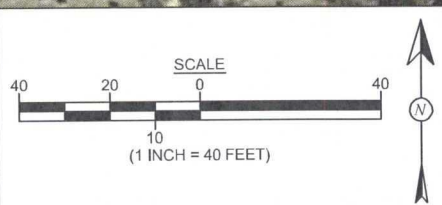
● SAMPLE LOCATIONS

Field Sampling Results				
Sample ID	Date	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOC D ACTION LEVEL		--	100	250
S-1	5/12/14	0.5	23.9	NA
S-2	5/12/14	0.3	20.1	NA
S-3	5/12/14	0.1	32.9	NA
S-4	5/12/14	0.2	<20.0	NA
S-5	5/12/14	1.0	<20.0	NA
SC-1	5/12/14	0.1	NA	60

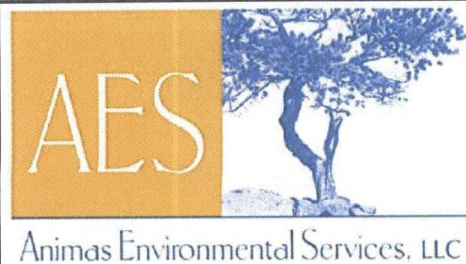
SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5. NA - NOT ANALYZED

Laboratory Analytical Results						
Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOC D ACTION LEVEL		0.2	50	100		250
SC-1	5/12/14	<0.030	<0.149	<3.0	<9.9	<30

SAMPLE WAS ANALYZED PER EPA METHOD 8015D, 8021B, AND 300.0.



AERIAL SOURCE: © 2013 GOOGLE EARTH, AERIAL DATE: NOVEMBER 17, 2013



DRAWN BY: S. Glasses	DATE DRAWN: May 13, 2014
REVISIONS BY: S. Glasses	DATE REVISED: May 16, 2014
CHECKED BY: D. Watson	DATE CHECKED: May 13, 2014
APPROVED BY: E. McNally	DATE APPROVED: May 13, 2014

FIGURE 2

**AERIAL SITE MAP
BELOW GRADE TANK CLOSURE
MAY 2014**

ConocoPhillips
HELEN JACKSON #2
NW¼ NE¼, SECTION 33, T29N, R9W
SAN JUAN COUNTY, NEW MEXICO
N36.68733, W107.78242

AES Field Sampling Report



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche
Farmington, NM 87401
505-564-2281

Durango, Colorado
970-403-3084

Client: ConocoPhillips

Project Location: Helen Jackson #2

Date: 5/12/2014

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Location	OMV (ppm)	Field Chloride (mg/kg)	TPH Analysis Time	TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-1	5/12/2014	14:33	North	0.5	NA	15:10	23.9	20.0	1	DAW
S-2	5/12/2014	14:34	South	0.3	NA	15:15	20.1	20.0	1	DAW
S-3	5/12/2014	14:35	East	0.1	NA	15:18	32.9	20.0	1	DAW
S-4	5/12/2014	14:37	West	0.2	NA	15:21	14.9	20.0	1	DAW
S-5	5/12/2014	14:38	Center	1.0	NA	15:25	12.4	20.0	1	DAW
SC-1	5/12/2014	14:42	Composite	0.1	60	Not Analyzed for TPH				

DF Dilution Factor
NA Not Analyzed
ND Not Detected at the Reporting Limit
PQL Practical Quantitation Limit

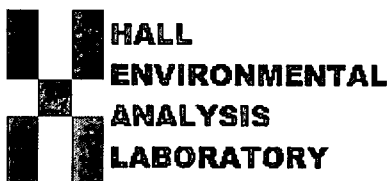
Total Petroleum Hydrocarbons - USEPA 418.1

*TPH concentrations recorded may be below PQL.

Field Chloride - Quantab Chloride Titrators or Drop Count
Titration with Silver Nitrate

Analyst:

Debrah Wata



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

May 15, 2014

Debbie Watson

Animas Environmental

624 East Comanche

Farmington, NM 87401

TEL: (505) 486-4071

FAX

RE: CoP Helen Jackson #2

OrderNo.: 1405485

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 5/13/2014 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman".

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1405485

Date Reported: 5/15/2014

CLIENT: Animas Environmental

Client Sample ID: SC-1

Project: CoP Helen Jackson #2

Collection Date: 5/12/2014 2:42:00 PM

Lab ID: 1405485-001

Matrix: MEOH (SOIL)

Received Date: 5/13/2014 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: BCN
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	5/13/2014 2:00:21 PM	13132
Surr: DNOP	90.7	57.9-140		%REC	1	5/13/2014 2:00:21 PM	13132
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	3.0		mg/Kg	1	5/13/2014 11:40:16 AM	R18567
Surr: BFB	81.7	74.5-129		%REC	1	5/13/2014 11:40:16 AM	R18567
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.030		mg/Kg	1	5/13/2014 11:40:16 AM	R18567
Toluene	ND	0.030		mg/Kg	1	5/13/2014 11:40:16 AM	R18567
Ethylbenzene	ND	0.030		mg/Kg	1	5/13/2014 11:40:16 AM	R18567
Xylenes, Total	ND	0.059		mg/Kg	1	5/13/2014 11:40:16 AM	R18567
Surr: 4-Bromofluorobenzene	86.5	80-120		%REC	1	5/13/2014 11:40:16 AM	R18567
EPA METHOD 300.0: ANIONS							Analyst: JRR
Chloride	ND	30		mg/Kg	20	5/13/2014 1:12:48 PM	13142

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

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank	Page 1 of 6
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded	
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit	
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2.	
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	
	S	Spike Recovery outside accepted recovery limits			

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1405485

15-May-14

Client: Animas Environmental

Project: CoP Helen Jackson #2

Sample ID	MB-13142		SampType:	MBLK		TestCode:	EPA Method 300.0: Anions			
Client ID:	PBS		Batch ID:	13142		RunNo:	18590			
Prep Date:	5/13/2014		Analysis Date:	5/13/2014		SeqNo:	536900		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-13142		SampType:	LCS		TestCode:	EPA Method 300.0: Anions			
Client ID:	LCSS		Batch ID:	13142		RunNo:	18590			
Prep Date:	5/13/2014		Analysis Date:	5/13/2014		SeqNo:	536901		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	96.1	90	110			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH greater than 2.
RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1405485

15-May-14

Client: Animas Environmental

Project: CoP Helen Jackson #2

Sample ID	MB-13132		SampType: MBLK	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	PBS		Batch ID: 13132	RunNo: 18557						
Prep Date:	5/13/2014		Analysis Date: 5/13/2014	SeqNo: 536327		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	8.3		10.00		83.4	57.9	140			

Sample ID	LCS-13132		SampType: LCS	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	LCSS		Batch ID: 13132	RunNo: 18557						
Prep Date:	5/13/2014		Analysis Date: 5/13/2014	SeqNo: 536328		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	40	10	50.00	0	79.5	60.8	145			
Surr: DNOP	4.0		5.000		79.7	57.9	140			

Sample ID	MB-13112		SampType: MBLK	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	PBS		Batch ID: 13112	RunNo: 18557						
Prep Date:	5/12/2014		Analysis Date: 5/13/2014	SeqNo: 536644		Units: %REC				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.9		10.00		88.8	57.9	140			

Sample ID	LCS-13112		SampType: LCS	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	LCSS		Batch ID: 13112	RunNo: 18557						
Prep Date:	5/12/2014		Analysis Date: 5/13/2014	SeqNo: 536647		Units: %REC				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.7		5.000		93.5	57.9	140			

Sample ID	MB-13119		SampType: MBLK	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	PBS		Batch ID: 13119	RunNo: 18557						
Prep Date:	5/12/2014		Analysis Date: 5/13/2014	SeqNo: 536743		Units: %REC				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	9.3		10.00		93.0	57.9	140			

Sample ID	LCS-13119		SampType: LCS	TestCode: EPA Method 8015D: Diesel Range Organics						
Client ID:	LCSS		Batch ID: 13119	RunNo: 18557						
Prep Date:	5/12/2014		Analysis Date: 5/13/2014	SeqNo: 536744		Units: %REC				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.7		5.000		94.4	57.9	140			

Qualifiers:

- | | |
|---------------------------------------------------|------------------------------------------------------|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1405485

15-May-14

Client: Animas Environmental

Project: CoP Helen Jackson #2

Sample ID	MB-13097	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	13097	RunNo:	18557					
Prep Date:	5/9/2014	Analysis Date:	5/14/2014	SeqNo:	536755	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.9		10.00		89.3	57.9	140			

Sample ID	LCS-13097	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	13097	RunNo:	18557					
Prep Date:	5/9/2014	Analysis Date:	5/14/2014	SeqNo:	536756	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.6		5.000		92.4	57.9	140			

Qualifiers:

- | | |
|---------------------------------------------------|------------------------------------------------------|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1405485

15-May-14

Client: Animas Environmental

Project: CoP Helen Jackson #2

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536695	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	860		1000		86.4	74.5	129			

Sample ID	2.5UG GRO LCS	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536696	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	102	71.7	134			
Surr: BFB	970		1000		97.3	74.5	129			

Sample ID	1405485-001AMS	SampType:	MS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	SC-1	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536698	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	13	3.0	14.81	0	91.1	69.5	145			
Surr: BFB	540		592.4		90.3	74.5	129			

Sample ID	1405485-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	SC-1	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536699	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	13	3.0	14.81	0	87.0	69.5	145	4.58	20	
Surr: BFB	540		592.4		91.1	74.5	129	0	0	

Qualifiers:

- | | |
|---------------------------------------------------|------------------------------------------------------|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1405485

15-May-14

Client: Animas Environmental

Project: CoP Helen Jackson #2

Sample ID	5ML RB	SampType:	MBLK		TestCode:	EPA Method 8021B: Volatiles				
Client ID:	PBS	Batch ID:	R18567		RunNo:	18567				
Prep Date:		Analysis Date:	5/13/2014		SeqNo:	536717		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	0.91		1.000		90.8	80	120			

Sample ID	100NG BTEX LCS	SampType: LCS		TestCode: EPA Method 8021B: Volatiles						
Client ID:	LCSS	Batch ID: R18567		RunNo: 18567						
Prep Date:	Analysis Date: 5/13/2014		SeqNo: 536718		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	105	80	120			
Toluene	1.1	0.050	1.000	0	105	80	120			
Ethylbenzene	1.0	0.050	1.000	0	105	80	120			
Xylenes, Total	3.2	0.10	3.000	0	107	80	120			
Surr: 4-Bromofluorobenzene	1.0		1.000		103	80	120			

Sample ID	1405485-001AMS	SampType:	MS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	SC-1	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536720	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.56	0.030	0.5924	0	94.0	67.4	135			
Toluene	0.56	0.030	0.5924	0	94.0	72.6	135			
Ethylbenzene	0.56	0.030	0.5924	0	95.1	69.4	143			
Xylenes, Total	1.8	0.059	1.777	0	101	70.8	144			
Surr: 4-Bromofluorobenzene	0.54		0.5924		91.9	80	120			

Sample ID	1405485-001AMSD	SampType:	MSD	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	SC-1	Batch ID:	R18567	RunNo:	18567					
Prep Date:		Analysis Date:	5/13/2014	SeqNo:	536721	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.54	0.030	0.5924	0	91.8	67.4	135	2.40	20	
Toluene	0.54	0.030	0.5924	0	91.8	72.6	135	2.35	20	
Ethylbenzene	0.56	0.030	0.5924	0	94.0	69.4	143	1.12	20	
Xylenes, Total	1.8	0.059	1.777	0	99.8	70.8	144	1.46	20	
Surr: 4-Bromofluorobenzene	0.60		0.5924		101	80	120	0	0	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit



HALL ENVIRONMENTAL ANALYSIS LABORATORY
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: Animas Environmental

Work Order Number: 1405485

RcptNo: 1

Received by/date:

Logged By: Lindsay Mangin

5/13/2014 10:00:00 AM

Completed By: Lindsay Mangin

5/13/2014 10:32:01 AM

Reviewed By:

Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐
6. Sample(s) in proper container(s)? Yes ☒ No ☐
7. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
8. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
9. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
10. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
11. Were any sample containers received broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?
(If no, notify customer for authorization.) Yes ☒ No ☐
- # of preserved bottles checked for pH: _____
(<2 or >12 unless noted)

Adjusted? _____

Checked by: _____

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:

Date:

By Whom:

Via:

☐ eMail

☐ Phone

☐ Fax

☐ In Person

Regarding:

Client Instructions:

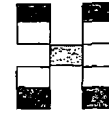
17. Additional remarks:

18. Cooler Information

Cooler No.	Temp. $^{\circ}\text{C}$	Condition	Seal Intact	Seal No.	Seal Date	Signed By
1	1.8	Good	Yes			

Client: <u>Animas Environmental</u>	<input type="checkbox"/> Standard <input checked="" type="checkbox"/> Rush <u>Same Day</u>
<u>Services LLC</u>	Project Name: <u>Cap Helen Jackson #2</u>
Mailing Address: <u>624 E Comanche</u>	Project #: <u>Cap Helen Jackson #2</u>
<u>Farmington NM 87401</u>	
Phone #: <u>505 564 2281</u>	
email or Fax#:	Project Manager: <u>D. Watson</u>
QA/QC Package:	
<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Level 4 (Full Validation)	
Accreditation	Sampler: <u>D. Watson</u>
<input type="checkbox"/> NELAP <input type="checkbox"/> Other _____	On Ice: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> EDD (Type) _____	Sample Temperature: <u>1.8</u>

Date: 5/13/14	Time: 635	Relinquished by: Deborah Watson	Received by: Kristen Waaler	Date 5/13/14	Time 635
Date: 5/13/14	Time: 645	Relinquished by: Kristen Waaler	Received by: [Signature]	Date 05/13/14	Time 1000



Remarks: Bill to Conoco Phillips
 WO: 103 54778 Area: 22
 act-cod: T110 UserID: KGARCIA
 Supervisor: Mick Ferrari ordered by: Doyle Clark

Analytical Report

Lab Order 1405485

Date Reported:

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental

Client Sample ID: SC-1

Project: CoP Helen Jackson #2

Collection Date: 5/12/2014 2:42:00 PM

Lab ID: 1405485-001

Matrix: MEOH (SOIL)

Received Date: 5/13/2014 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015D: DIESEL RANGE ORGANICS						Analyst: BCN
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	5/13/2014 2:00:21 PM
Surr: DNOP	90.7	57.9-140		%REC	1	5/13/2014 2:00:21 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/13/2014 11:40:16 AM
Surr: BFB	81.7	74.5-129		%REC	1	5/13/2014 11:40:16 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	0.050		mg/Kg	1	5/13/2014 11:40:16 AM
Toluene	ND	0.050		mg/Kg	1	5/13/2014 11:40:16 AM
Ethylbenzene	ND	0.050		mg/Kg	1	5/13/2014 11:40:16 AM
Xylenes, Total	ND	0.10		mg/Kg	1	5/13/2014 11:40:16 AM
Surr: 4-Bromofluorobenzene	86.5	80-120		%REC	1	5/13/2014 11:40:16 AM

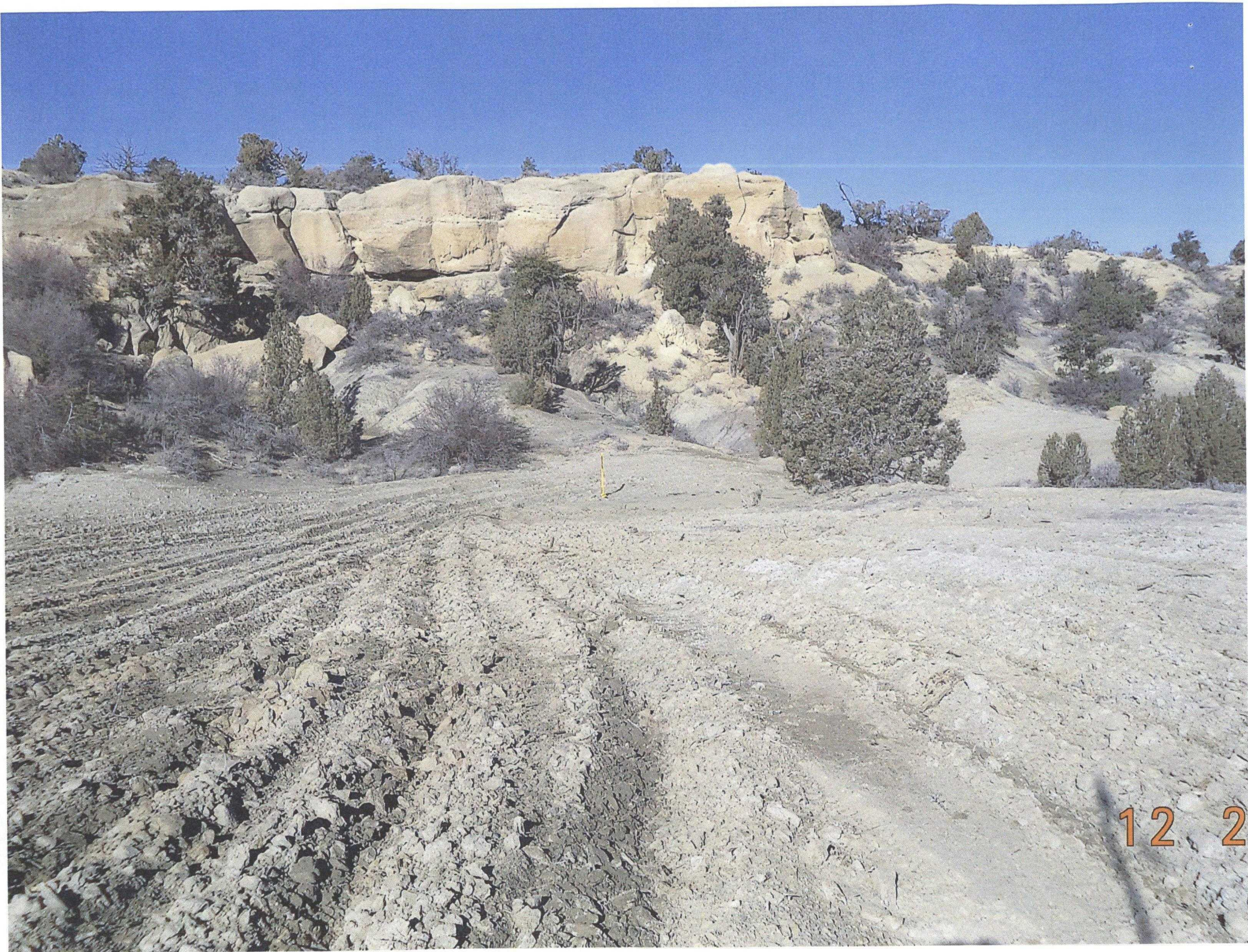
Chloride = Non-Detect

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

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RPD is greater than RSD limit	N	Sample pH greater than 2
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

PRELIMINARY

Page 1 of 0



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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

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

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company	ConocoPhillips	Contact	Patsy Clugston
Address	P. O. Box 4289, Farmington, NM 87499	Telephone No.	505-326-9518
Facility Name	Helen Jackson #2	Facility Type	Gas Well

Surface Owner	Federal	Mineral Owner	Federal – SF-079947	API No.	30-045-07723
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	33	29N	9W	790	North	1265	East	San Juan

Latitude 36.687301 Longitude -107.78157

NATURE OF RELEASE

Type of Release	none	Volume of Release	N/A	Volume Recovered	N/A
Source of Release	N/A	Date and Hour of Occurrence-	N/A	Date and Hour of Discovery	N/A
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?	Date and Hour				
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

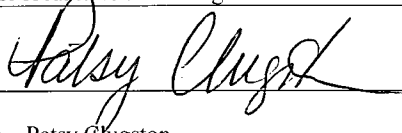
If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

BGT Closure: no release found upon removal.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Patsy Clugston	Approved by Environmental Specialist:		
Title: Staff Regulatory Technician	Approval Date:	Expiration Date:	
E-mail Address: Patsy.L.Clugston@conocophillips.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3-3-15 Phone: 505-326-9518			

* Attach Additional Sheets If Necessary

A

BGT Closure Packet Check List - Well Name: Helen Jackson 2
(S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\BGT Closure Check List)

3/3/15 ✓ DA ✓ PC

Below-grade Tank Closure Report from HSE

3/3/15 - DA ✓ PC

(S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents)

Sampling (S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents)

3/3/15 ✓ DA ✓ PC

Proof of Closure (72 Hour Notice) e-mail to NMOCD E-mail notice located @

S:\gsREG\WELLS LIST\WELL NAME\72 Hour Notice BGT Closure (for post 2008 BGT's.) or research through Jamie's Folder in LRM (subfolders designated) - some have been moved to Wells List or Regulatory Pits\New Requirements\BGT_Closure Report_e-mails\some don't exist at all.

Surface Owner Notification -(S:\gsREG\Wells List\Well Name) Saved copy of e-mail you sent

3/3/15 ✓ DA ✓ PC

Pictures (Pit Closure Form located @ S:\gsProj\tssjd-copy\Construction\Open Pit Inspections (EEF170). Print the reclamation form for reference of Closure Date for C144 (use Start of Reclamation as the Closure Date)-If Reclamation has not taken place, we only need a picture of when they backfilled after removing the BGT.

3/3/15 ✓ DA ✓ PC

C144 with correct operator, well name, lat/long., surface owner

(S:\gs REG\Regulatory Pits (ADM090-12yrs)\New Requirements\C-144 Forms\Pre 2013 C144 Forms/BGT Closure (OLD)-Closure date for BGT's that have not had reclamation work done would be the date the samples were taken when BGT was removed.

3/3/15 ✓ DA ✓ PC

Below-grade Tank Closure Report Summary w/ C-141

(S:\gs REG\Regulatory Pits (ADM090-12yrs)\New Requirements\BGT Closure Summary Report Templates\Normal or Without Reclamation C-141 found @ S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks

if no release occurred complete C144

Order for submitting the packet

1. C144 Form
2. BGT Closure Report Summary
3. Proof of Closure (72 Hour Notice) e-mail to NMOCD
4. BGT Closure Report from HSE & C141 Form
5. Sampling Results
6. Pictures

The items on this checklist need to be checked off and initialed by the person completing the work and must accompany the C-144 Closure Packet when it is handed off for QC and the QC person must initial it as well. This checklist is to be scanned into Wells List & DSM as part of the BGT Closure Packet.

Updated 11/20/14