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 874	10
District IV	
1220 S. St. Francis Dr., Santa Fe, NM 8	37505

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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						
12794 Proposed Alternative Method Permit or Closure Plan Application						
Type of action: Hereit of a pit or proposed alternative method Hermit 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 nvironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.						
1. Organization Production Company OCBID # 778						
1. Operator: BP America Production CompanyOGRID #:778 Address:200 Energy Court, Farmington, NM 87401 OGRID #:778						
MAR 1 6 2015 API Number:3004509601 OCD Permit Number:						
U/L or Qtr/QtrO Section11 Township30N Range11W County: San Juan MOCD						
Center of Proposed Design: Latitude36.82114 Longitude107.95703 NAD: □1927 ⊠ 1983 Surface						
Owner: 🛛 Federal 🗌 State 🗌 Private 🗌 Tribal Trust or Indian Allotment						
 2. Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other String-Reinforced Liner Seams: Welded Factory Other Volume:bbl Dimensions: L x W x D 						
3.						
Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A						
Volume: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 _Double walled/double bottomed; side walls not visible						
Liner type: Thicknessmil						
4. Alternative Method:						

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



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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_

5

6

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)

Screen Netting Other

Monthly inspections (If netting or screening is not physically feasible)

Signs: Subsection C of 19.15.17.11 NMAC

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

Signed in compliance with 19.15.16.8 NMAC

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					
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank	☐ 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 					
 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 					
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 					

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	Yes No					
- 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 						
 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 						
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N. <i>Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.</i> 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 19.15.17.10 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 19.13 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	numents are NMAC 15.17.9 NMAC					
II.						
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.10 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC					

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 orattached. 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 Fl 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	uid Management Pit				
 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 	Yes No				
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	Yes No				
 Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site 	Yes No				
Written confirmation or verification from the municipality; Written approval obtained from the municipality	Yes No				
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site					
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance					

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 						
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological 						
Society; Topographic map Within a 100-year floodplain.	🗌 Yes 🗌 No					
- FEMA map	🗌 Yes 🗌 No					
 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 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 	ef.					
Name (Print): Title:						
Signature: Date:						
e-mail address: Telephone:						
18. OCD Approval: Permit Application (including closure plan) Image: Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Image: Closure Plan (only) OCD Conditions (see attachment) Title: Image: Complexity Image: Closure Plan (only) OCD Permit Number:	2015					
19.						
<u>Closure Report (required within 60 days of closure completion)</u> : 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.						
Closure Completion Date: 2/3/2015						
20. Closure Method: Waste Excavation and Removal On-Site Closure Method If different from approved plan, please explain.	op systems only)					
^{21.} Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please ind						

	· ·	
ļ	. 22.	
	Operator Closure Certification:	
	I hereby certify that the information and attachments submitted with belief. I also certify that the closure complies with all applicable cl	h this closure report is true, accurate and complete to the best of my knowledge and losure requirements and conditions specified in the approved closure plan.
	Name (Print):Jeff Peace	Title: Field Environmental Coordinator
	Signature: Joff Poore	Date:March 13, 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

Storey B LS 5 API No. 3004509601 Unit Letter O, Section 11, T30N, R11W

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

General Closure Plan

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement. **Notice is attached.**
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.

Notice is attached.

- 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.

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	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.40
TPH	US EPA Method SW-846 418.1	100	59.9
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.

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 is still within the active well area.

10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

BP will seed the area when the well is plugged and abandoned as part of final reclamation.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation. Closure report on C-144 form is included.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

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State of New Mexico Energy Minerals and Natural Resources

> Oil Conservation Division 1220 South St. Francis Dr.

Revised August 8, 2011 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

1220 S. St. Fran	icis Dr., Sant	a Fe, NM 8750	5	Sa	anta F	e, NM 875	505				
			Rel	ease Notifi	catio	n and Co	orrective A	ction			
						OPERA	TOR	🗍 Init	ial Report	\boxtimes	Final Report
Name of Co	ompany: B	Р				Contact: Jet			au report		T mai reepon
		Court, Farm	ington, N	M 87401			No.: 505-326-94	79			
Facility Nat	v		0				be: Natural gas v				
Surface Ow	mar: Eadar			Mineral (Junom	Endoral		ADIN	2004500	601	
Surface Ow	ner. reder	al		Ivinieral (Jwner.	rederal		APIN	0. 3004509	001	
			1			N OF RE		1	1		
Unit Letter O	Section 11	Township 30N	Range 11W	Feet from the 800	North South	/South Line	Feet from the 1,800	East/West Line East	County: S	an Juar	1
		Lat	itude_3	6.82114		Longitud	e_107.95703_				
				NAT	TURE	OF REL					
Type of Rele							Release: N/A		Recovered: 1		
Source of Re	lease: belov	v grade tank –	- 95 bbl			Date and H	Hour of Occurrence	e: Date and	l Hour of Dis	covery	: N/A
Was Immedi	ate Notice (Given?				If YES, To	Whom?				
			Yes 🗌] No 🛛 Not R	equired						
By Whom?						Date and H	Iour				
Was a Water	course Read		Yes 🛛	No		If YES, Volume Impacting the Watercourse.					
If a Watercou	irse was Im	pacted, Descr	ibe Fully.*	¢							
Describe Cau	ise of Proble	em and Reme	dial Action	n Taken * Sampli	ng of th	e soil beneath	the BGT was do	ne during remova	to ensure no	soil im	upacts from
							sis results are attac		to ensure no	5011 111	ipuets nom
					moved a	and the area u	nderneath the BG	T was sampled.	The area unde	er the B	BGT was
backfilled an	d compacted	d and is still v	vithin the a	active well area.							
							knowledge and u				
							nd perform correc arked as "Final R				
							on that pose a three				
				tance of a C-141	report d	oes not reliev	e the operator of r	responsibility for	compliance w	vith any	/ other
federal, state,	or local lay	ws and/or regu	ilations.				OIL CON	SERVATION	DIVISIO	NI	
$\int \rho \rho \rho$					SERVATION	DIVISIC	<u>JIN</u>				
Signature:	yer .	12000	-								
Printed Name: Jeff Peace					Approved by	Environmental S	pecialist:				
		al Coordinato	or			Approval Dat	te:	Expiration	Date:		
		effrey@bp.cor				Conditions of				_	
25 mail / Katik									Attached		
Date: March		ate If Necess		505-326-9479							

* Attach Additional Sheets If Necessary

· ·						
CLIENT: BP	BLAGG ENGINEERING, P.O. BOX 87, BLOOMFIELD, (505) 632-1199	API #: 3004509601 TANK ID (if applicble): A				
FIELD REPORT:						
SITE INFORMATION QUAD/UNIT: 0 SEC: 11 TWP: 1/4 -1/4/FOOTAGE: 800'S / 1,800	30N RNG: 11W PM: NM CNTY: 3		DATE STARTED: 01/30/15 DATE FINISHED:			
	ROD. FORMATION: FT/PC CONTRACTOR: MBF -	r genn	ENVIRONMENTAL SPECIALIST(S): JCB			
REFERENCE POINT 1) 95 BGT (DW/DB)		32129 X 107.95765 3 DISTANCE/BEA	RING FROM W.H.: 186', S74E			
	GPS COORD.:		RING FROM W.H.:			
⁴⁾ SAMPLING DATA:		DISTANCE/BEAI	OVM			
1) SAMPLE ID: 95 BGT 5-pt. (2) SAMPLE ID:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: ENVIR 5' SAMPLE DATE: 01/30/15 SAMPLE TIME: 13(SAMPLE DATE: SAMPLE TIME: SAMP	LAB ANALYSIS: 418.1/8 LAB ANALYSIS: LAB ANALYSIS:				
	SAMPLE DATE:					
SOIL COLOR: DARK YELLOWISH ORANGE PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC CONSISTENCY (NON COHESIVE SOILS): LOOSE (FIRM) DENSE / VERY DENSE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD MOISTURE: DRY / SLIGHTLY MOIST MOIST / WET / SATURATED / SUPER SATURATED HC ODOR DETECTED: YES NO EXPLANATION - SAMPLE TYPE: GRAB / COMPOSITE # OF PTS. 5 ANY AREAS DISPLAYING WETNESS: YES NO EXPLANATION - DISCOLORATION/STAINING OBSERVED: YES NO EXPLANATION -						
SOIL IMPACT DIMENSION ESTIMATION:			TMATION (Cubic Yards) : NA			
	AREST WATER SOURCE: >1,000' NEAREST SURFACE WA	TER: <200' NMOC	D TPH CLOSURE STD: 100 ppm			
SITE SKETCH W.H. TO EPHEMERAL WASH STOREY B#11M W.H.	BGT Located : off on site PLOT PLAN SEPARAT COMPRESSOR PUMP JACK B.G. COMPRESSOR		CALIB. READ. = 52.1 ppm CALIB. GAS = 100 ppm : 12:10 an(pm) DATE 01/30/15 MISCELL. NOTES /O: N15481495 O #: K: ZEVH01BGT2 J #: Z2-006Q0			
		O Tar ID A X - S.P.D.	e the engineer engineer the			
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL	N DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APF WGRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RET/ WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM. IRY DATE: 11/17/2013. ONSITE: 01	AINING WALL; NA - NOT	lagnetic declination: 10° E			



BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
95 BGT 5-pt @ 5'	P501083-01A	Soil	01/30/15	01/30/15	Glass Jar, 4 oz.

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Projec	et Name: et Number: et Manager:	0314	ey B LS 5 13-0424 Blagg				Reported: 03-Feb-15 12	
			T 5-pt (<u> </u>					
		P5010	83-01 (Se	olid)					
		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.10	mg/kg	I	1506002	02/01/15	02/02/15	EPA 8021B	
Toluene	ND	0.10	mg/kg	Ι	1506002	02/01/15	02/02/15	EPA 8021B	
Ethylbenzene	ND	0.10	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8021B	
p,m-Xylene	0.21	0.20	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8021B	
o-Xylene	0.19	0.10	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8021B	
Total Xylenes	0.40	0.10	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8021B	
Total BTEX	0.40	0.10	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8021B	
Surrogate: 4-Bromochlorobenzene-PID		108 %	50	-150	1506002	02/01/15	02/02/15	EPA 8021B	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	ND	9.98	mg/kg	1	1506002	02/01/15	02/02/15	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg	1	1506001	02/01/15	02/02/15	EPA 8015D	
Surrogate: o-Terphenyl		118 %	50-	-200	1506001	02/01/15	02/02/15	EPA 8015D	
Surrogate: 4-Bromochlorobenzene-FID		96.9 %	50-	-150	1506002	02/01/15	02/02/15	EPA 8015D	
Total Petroleum Hydrocarbons by 418.1									
Total Petroleum Hydrocarbons	59.9	35.0	mg/kg	1	1506005	02/02/15	02/02/15	EPA 418.1	
Cation/Anion Analysis									
Chloride	ND	9.95	mg/kg	1	1506003	02/01/15	02/01/15	EPA 300.0	

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BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1506002 - Purge and Trap EPA 5030A										
Blank (1506002-BLK1)				Prepared: 0)1-Feb-15	Analyzed: ()2-Feb-15			
Benzene	ND	0.10	mg/kg							
Foluene	ND	0.10								
Ethylbenzene	ND	0.10	н							
,m-Xylene	ND	0.20								
-Xylene	ND	0.10	н							
Fotal Xylenes	ND	0.10	н							
Total BTEX	ND	0.10	н							
urrogate: 4-Bromochlorobenzene-PID	0.444		"	0.399		111	50-150			
LCS (1506002-BS1)				Prepared: 0	1-Feb-15	Analyzed: ()2-Feb-15			
Benzene	17.6	0.10	mg/kg	19.9		88.1	75-125			
oluene	18.6	0.10		19.9		93.3	70-125			
Ethylbenzene	19.2	0.10	н	19.9		96.5	75-125			
o,m-Xylene	38.7	0.20	н	39.9		97.1	80-125			
)-Xylene	18.8	0.10	.11	19.9		94.3	75-125			
urrogate: 4-Bromochlorobenzene-PID	0.428		"	0.399		107	50-150			
Matrix Spike (1506002-MS1)	Sou	rce: P501083-	01	Prepared: 0	1-Feb-15	Analyzed: ()2-Feb-15			
Benzene	17.9	0.10	mg/kg	20.0	ND	89.6	75-125			
Toluene	19.2	0.10	11	20.0	ND	96.1	70-125			
Ethylbenzene	19.9	0.10	п	20.0	ND	99.4	75-125			
o,m-Xylene	40.2	0.20	н	40.0	0.21	100	80-125			
-Xylene	19.7	0.10	н	20.0	0.19	97.6	75-125			
Surrogate: 4-Bromochlorobenzene-P1D	0.437		п	0.400		109	50-150			
Matrix Spike Dup (1506002-MSD1)	Sou	rce: P501083-	01	Prepared: 0)1-Feb-15	Analyzed: ()2-Feb-15			
Benzene	18.7	0.10	mg/kg	20.0	ND	93.5	75-125	4.25	15	
Toluene	19.8	0.10	н	20.0	ND	99.2	70-125	3.17	15	
Ethylbenzene	20.4	0.10	н	20.0	ND	102	75-125	2.80	15	
),m-Xylene	41.3	0.20	н	40.0	0.21	103	80-125	2.75	15	
)-Xylene	20.5	0.10	**	20.0	0.19	101	75-125	3.80	15	
Surrogate: 4-Bromochlorobenzene-PID	0.462		**	0.400		116	50-150			

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BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

			-							
		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1506001 - DRO Extraction EPA 3550M										
Blank (1506001-BLK1)				Prepared: (01-Feb-15	Analyzed: ()2-Feb-15			
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Surrogate: o-Terphenyl	49.8		н	40.0		125	50-200			
LCS (1506001-BS1)				Prepared: (01-Feb-15	Analyzed: ()2-Feb-15			
Diesel Range Organics (C10-C28)	498	25.0	mg/kg	500		99.6	38-132			
Surrogate: o-Terphenyl	47.6		"	40.0		119	50-200			
Matrix Spike (1506001-MS1)	Sour	·ce: P501083-	01	Prepared: 01-Feb-15 Analyzed: 02-Feb-15						
Diesel Range Organics (C10-C28)	481	25.0	mg/kg	500	ND	96.3	38-132			
Surrogate: o-Terphenyl	46.0		11	40.0		115	50-200			
Matrix Spike Dup (1506001-MSD1)	Sour	·ce: P501083-	01	Prepared: (01-Feb-15 2	Analyzed: ()2-Feb-15			
Diesel Range Organics (C10-C28)	475	25.0	mg/kg	500	ND	95.1	38-132	1.26	20	
Surrogate: o-Terphenyl	45.8		"	40.0		115	50-200			

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BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

			•		•					
		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1506002 - Purge and Trap EPA 5030A										
Blank (1506002-BLK1)				Prepared: ()1-Feb-15	Analyzed: ()2-Feb-15			
Gasoline Range Organics (C6-C10)	ND	9.98	mg/kg							
Surrogate: 4-Bromochlorobenzene-FID	0.400		"	0.399		100	50-150			
LCS (1506002-BS1)				Prepared: (1-Feb-15	Analyzed: ()2-Feb-15			
Gasoline Range Organics (C6-C10)	263	9.96	mg/kg	291		90.5	80-120			
Surrogate: 4-Bromochlorobenzene-FID	0.386		"	0.399		96.9	50-150			
Matrix Spike (1506002-MS1)	Sou	rce: P501083-	01	Prepared: 0	1-Feb-15	Analyzed: ()2-Feb-15			
Gasoline Range Organics (C6-C10)	272	9.99	mg/kg	292	ND	93.3	75-125			
Surrogate: 4-Bromochlorobenzene-FID	0.390			0.400		97.6	50-150			
Matrix Spike Dup (1506002-MSD1)	Sou	rce: P501083-	01	Prepared: 0)1-Feb-15 /	Analyzed: ()2-Feb-15			
Gasoline Range Organics (C6-C10)	283	10.0	mg/kg	292	ND	97.1	75-125	4.01	15	
Surrogate: 4-Bromochlorobenzene-F1D	0.415		"	0.400		104	50-150			



BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Total Petroleum Hydrocarbons by 418.1 - Quality Control

Envirotech Analytical Laboratory												
		Reporting		Spike	Source		%REC		RPD			
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes		
Batch 1506005 - 418 Freon Extraction								_				
Blank (1506005-BLK1)				Prepared &	Analyzed:	02-Feb-15						
Total Petroleum Hydrocarbons	ND	35.0	mg/kg									
Duplicate (1506005-DUP1)	Sour	ce: P501083-	01	Prepared &	Analyzed:	02-Feb-15						
Total Petroleum Hydrocarbons	67.8	34.9	mg/kg		59.9			12.2	30			
Matrix Spike (1506005-MS1)	Sour	Prepared &	Analyzed:	02-Feb-15								
Total Petroleum Hydrocarbons	2060	35.0	mg/kg	2020	59.9	99.2	80-120					

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BP America Production Co.	Project Name:	Storey B LS 5	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Jeff Blagg	03-Feb-15 12:52

Cation/Anion Analysis - Quality Control

Envirotech Analytical Laboratory

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1506003 - Anion Extraction EPA 300.0									5	
Blank (1506003-BLK1)				Prepared &	Analyzed:	01-Feb-15				
Chloride	ND	9.96	mg/kg							
LCS (1506003-BS1)				Prepared &	Analyzed:	01-Feb-15				
Chloride	468	9.81	mg/kg	490		95.4	90-110			
Matrix Spike (1506003-MS1)	Sour	ce: P501083-	01	Prepared &	Analyzed:	01-Feb-15				
Chloride	479	9.81	mg/kg	491	ND	97.6	80-120			
Matrix Spike Dup (1506003-MSD1)	Source: P501083-01			Prepared &	Analyzed:	01-Feb-15				
Chloride	480	9.81	mg/kg	491	ND	97.8	80-120	0.147	20	

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CHAIN OF CUSTODY RECORD 17736

Client: BP Amenica	ion: Zue C						ANALYSIS / PARAMETERS																
Email results to: Jeff Peac	STOREY 1 Impler Name:	STOREY B LS 5										_									_		
						015)	8021	260)															
IGH Blagg N Client Phone No.:		Cli	J- Blac ent No.: 03143	-042	Ч				TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	Metals	Cation / Anion		TCLP with H/P	CO Table 910-1	3.1)	Ы				000	Sample Intact
505-320-118	1		05.15	012	1	D	reservati		(Me	X (M	(Me	A 8	1/ 10		P wit	Lable	(418	ORII				ple	ple
Sample No./ Identification	Sample Date	Sample Time	Lab No.	of Co	/olume ntainers	HNO3	1 1	ve	TPH	BTE	VOC	RCR	Catic	RCI	TCLF	CO	TPH (418.1)	CHLORIDE				Sample Cool	Sam
95 BGt / 5-pt e 5	1/30/2015	1305	P501083-01	l×	402				×	x							×	×			1	¥	X
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Relinquished by: (Signature)				Date	Time	Raca	ived b	V: (Si	apati	[7	HR	67		C	F	11	0.	FU	91		Date	Tin	ne
Relinguished by: (Signature)			1/3	2015	1348	nece	ived b	y. (O	gnau		7		1		, 10	1					3/15		/
Relinquished by: (Signature)						Rece	ived b	y: (Si	ignati	Hre)						-					~		1-
Sample Matrix																				+			-
Soil 🗶 Solid 🗆 Sludge 🗆	Aqueous 🗌	Other]																				
Sample(s) dropped off after	hours to see	cure drop c	iff area.	36	env Ang	ir (ec) y					7	9				-			
5795 US Highway 64	4 • Farmingto	on, NM 874	01 • 505-632-0615 • 1	hree Spri	ngs • 65 M	Aerca	do Stre	eet, S	uite 1	15, D	ouran	go, C	0 81	301 •	labo	rator	y@en	virote	ech-ind	P	age 1	0 of	10

bp



BP America Production Company 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

January 19, 2015

City of Aztec c/o Bill Homka 201 W Chaco St. Aztec, NM 87410

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank Well Name: STOREY B LS 005 API #: 3004509601

Dear Mr. Homka,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about January 29, 2015. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at (505)-326-9214.

Sincerely,

Duarkin

Jerry Van Riper Surface Land Negotiator BP America Production Company

BP America Production Company 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US

January 19, 2014

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

STOREY B LS 005 API 30-045-09601 (0) Section 11 – T30N – R11W San Juan County, New Mexico

Dear Mr. Cory Smith:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95 bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around January 29, 2015.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

eace

Jeff Peace BP Field Environmental Advisor

(505) 326-9479



