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	
Proposed Alternative Method Permit or Closure Plan Application	
Type of action: Below grade tank registration OIL CONS. DIV DIST. 3	
Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method MAR 26 2015 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 ease 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	
vironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.	
Operator: BP America Production CompanyOGRID #:778	
Address:200 Energy Court, Farmington, NM 87401	
Facility or well name:Neil A 9A	
API Number:3004522817OCD Permit Number:6325	
U/L or Qtr/QtrESection4Township31NRange11WCounty:San Juan	
Center of Proposed Design: Latitude36.92944 Longitude107.99960 NAD: ☐1927 ☒ 983	
Surface Owner: 🛮 Federal 🗌 State 🗎 Private 🔲 Tribal Trust or Indian Allotment	
	7
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	
	7
■ Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A	
Volume:21.0bbl Type of fluid:Produced water	
Tank Construction material:Steel	
Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other _Single walled/double bottomed; side walls not visible	
iner type: Thicknessmil	
Alternative Method:]

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

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church)	hospital,
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	
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 acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	
	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).	☐ Yes ☐ No
- Topographic map; Visual inspection (certification) of the proposed site	L TES L NO
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached.	
Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 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. and 19.15.17.13 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC	
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	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 H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	uocuments are
13. Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F Alternative 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	iluid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15. Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I	rce material are 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 Ground water is between 25-50 feet below the bottom of the buried waste	☐ Yes ☐ No☐ NA☐ Yes ☐ No☐ No☐ No☐ No☐ No☐ No☐ No☐ No☐ No☐ N
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Ground water is more than 100 feet below the bottom of the buried waste.	□ NA □
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	
Within a 100-year floodplain FEMA map	Yes No
•	
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19 Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	.11 NMAC .15.17.11 NMAC
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 bel	ief.
Name (Print): Title:	
Signature: Date:	
e-mail address: Telephone:	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 4/14 Title: OCD Permit Number:	/2015
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do no section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date: 9/29/2010	
20. Closure Method: Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-land) If different from approved plan, please explain.	oop systems only)

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure requires	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Signature:	Date:March 26, 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

Neil A 9A API No. 3004522817 Unit Letter E, Section 4, T31N, 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.
 - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
 - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)

- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

The BGT was transported to a storage area for sale and re-use.

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

All equipment associated with the BGT has been removed.

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows:

Constituents	Testing Method	Release Verification	Sample
	21 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	0.32
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	9.69
TPH	US EPA Method SW-846 418.1	100	170
Chlorides	US EPA Method 300.0 or 4500B	250 or background	36

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 total BTEX and chloride levels were below the stated limits. TPH was 170 ppm by Method 418.1 and was 150 ppm by Method 8015B. Benzene was 0.32 ppm by Method 8021B. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results indicate a release occurred. The release was addressed through the spill and release guidelines and remediation was completed on September 29, 2010.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

The area under the BGT was backfilled with clean soil and is still within the active well area.

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

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

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

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

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

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

- 13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
 - BP will seed the area as part of final reclamation when the well is plugged and abandoned.
- 14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.
 - BP will notify NMOCD when re-vegetation is successful.
- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation.

 Closure report on C-144 form is included.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 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

Revised August 8, 2011

Form C-141

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

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

			Rele	ease Notific	cation	n and Co	rrective A	ction					
						OPERA	ГOR		☐ Initia	al Report	\boxtimes	Final Report	
Name of Co	mpany: B	P				Contact: Jef	f Peace			_			
		Court, Farmi	ington, N	M 87401		Telephone No.: 505-326-9479							
Facility Nat	ne: Neil A	9A	Facility Type: Natural gas well										
Surface Ow	ner: Feder	al	Federal			API No	. 30045228	317					
				LOCA	ATIO	N OF REI	LEASE						
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/W	Vest Line	County: S	an Juan		
Е	4	31N	11W	1,820	North		1,190	West					
		Lat	itude 3	6.92944		Longitud	le 107.99960						
					THOE								
Type of Rele	ose: oil/con	dancota		NAI	UKE	OF REL	Release: unknow	743	Volumo E	Recovered: n	000		
		w grade tank –	95 hhl				Iour of Occurrence			Hour of Dis	100000000000000000000000000000000000000	· Inly 14	
504100 0110		Stade taint	70 001			unknown	iour or occurrence		2010; 11:		covery.	. July 11,	
Was Immedia	ate Notice (If YES, To	Whom?						
			Yes 🛚	No Not R	equired								
By Whom?						Date and H							
Was a Water	course Rea		V V	l N-		If YES, Vo	olume Impacting t	the Wate	rcourse.				
			Yes 🛚	I NO									
If a Watercou	irse was Im	pacted, Descr	ibe Fully.*										
the BGT. So	il analysis i	resulted in tota	al BTEX a		w standa		the BGT was do s 170 ppm by Me						
release occur	red. The re	elease was add	ressed thro		l release	guidelines an	nderneath the BG d remediation wa						
regulations a public health should their or or the environ	Il operators or the envi operations homent. In a	are required to ronment. The nave failed to a	o report ar acceptant adequately OCD accep	nd/or file certain in the of a C-141 report investigate and in	release n ort by the remediat	otifications are NMOCD me contaminati	knowledge and und perform correct arked as "Final R on that pose a three the operator of	ctive action deport" do reat to gro	ons for rele oes not reli ound water	eases which eve the open c, surface wa	may er rator of iter, hu	idanger Tiability man health	
		0					OIL CON	SERV.	ATION	DIVISIO	N		
Signature:	all	Veace	-										
	X Du					Approved by	Environmental S	pecialist	:				
Printed Name	e: Jeff Peac	e			-								
Title: Field E	nvironmen	tal Coordinato	r			Approval Dat	te:	F	Expiration	Date:			
E-mail Addre	ess: peace.j	effrey@bp.com	n			Conditions of	f Approval:			Attached			
Date: March	25, 2015		Phone:	505-326-9479									

^{*} Attach Additional Sheets If Necessary

DD.	BLAGG E	NGINEERING, INC.					
CLIENT:	P.O. BOX 87, BL	LOOMFIELD, NM 87413	3	API#: 3004522817			
	(505)	632-1199					
FIELD REPORT:	BGT CONFIRMATION TEMP	P. PIT CLOSURE RELEASE INVESTIGATION	PA	AGE No: 1 of 1			
SITE INFORMATION	: SITE NAME: NEIL	A #9A	D	ATE STARTED: 07/14/10			
QUAD/UNIT: E SEC: 4 TW	P: 31N RNG: 11W PN	M: NM CNTY: SJ ST: NM					
QTR-QTR/F00TAGE: 1.820'N/1	.190'W SW/NW LEAS	SE TYPE: FEDERAL STATE / FEE /	INIDIANI				
05050054			Li	IOD			
REFERENCE POINT	: WELL HEAD (W.H.)	GPS COORD.: 36.92919	X 107.99983	GL ELEV.: 6,252'			
1) 21 BGT (SW/DB)	GPS COORD.:	36.92944 X 107.99960	DISTANCE/BEARIN	IG FROM W.H.: 115', N39E			
l <u>'</u>			DISTANCE/BEARIN	G FROM W.H.:			
I *							
· ·							
LAB INFORMATION:	CHAIN OF CUSTOR	V DECODD(C).		OVM			
			410 1/00	Max 2, 2030322			
				15/6021/4500B (CI) NA			
3) SAMPLE ID:							
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANAL	LYSIS:				
5) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANAL	LYSIS:				
SOIL DESCRIPTION	SOIL TYPE: SAND	SILTY SAND SILT (SILTY CLAY) CLAY /	GRAVEL OTHER	BEDROCK (shale)			
SOIL COLOR: OLIVE GF	RAY TO BLACK			YES NO EXPLANATION -			
		DUESIAE -					
			CINO EVDIA	NATION APPADENT 9			
		HARD STRONG FROM DISCOLORE	D SOILS & BEDI	ROCK SURFACE.			
			POSITE # OF P	TS. 5			
IN NATURE FROM EITHER THE BGT, PI	RODUCTION TANK, OR POSS	SIBLY BOTH.					
	2	2		2			
	ft. X	f ft. X _ f ft.	cubic yards ex				
SITE SKETCH		OVM CALIB. READ. = NA ppm	RF = 0.52				
		OVM CALIB. GAS = NA ppm		circle. Attached			
		TIME: NA am/pm DATE:	NA N	/IISCELL. NOTES			
			Nog	5135			
			N N	7133			
				Not Applicable			
	FENCE		NA -	Not Applicable			
	I ENOL	PBGTL					
	1,	I.B. ~ T B.G.					
FIELD REPORT: (BET CONFRIGATION) THE PIT CLOSURE (RELASE INVESTIGATION) PAGE NO. 1 of 1 SITE INFORMATION: STEMME NEIL A # 9A DATE STATED 07/14/10 OUADJUINT E SEC 4 TAP 31N RNG 11W PM NM CNTY. SJ 5T NM DATE STATED 07/14/10 OUE PINSED OUTFOUR OF THE PROD FORMATION PC CONTRACTOR ELKHORN SPECIALST JCB REFERENCE POINT: WELL HEAD (WH) GPS COORD: 36,92944 X 107,99960 DISTAGEBERHOR FROW WELL 1) GPS COORD:							
HEAD							
Ψ		V C	DD -				
NOTES: BGT = BELOW-GRADE TANK: F.D. = FXCA	VATION DEPRESSION: B.G. = BELOW			SNETIC DECLINATION @ 42°E			
T.B. = TANK BOTTOM; PBGTL = PREVIOUS	BELOW-GRADE TANK LOCATION; SE	PD = SAMPLE POINT DESIGNATION; R.W. = RETAIN	ING WALL,	JAL 110 DECLINATION (# 13 E			
TRAVEL NOTES: CALLOUT:		ONSITE: 07/14/10					

Hall Environmental Analysis Laboratory, Inc.

Date: 28-Jul-10

CLIENT:

Blagg Engineering

Lab Order:

1007585

Project:

NEIL A 9A

Lab ID:

1007585-01

Client Sample ID: 21 BGT 5PT@7'

Collection Date: 7/14/2010 11:30:00 AM

Date Received: 7/16/2010

Matrix: SOIL

Analyses	Re	esult	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	GE ORGA	NICS					Analyst: JB
Diesel Range Organics (DRO)		ND	10		mg/Kg	1	7/20/2010 2:09:13 PM
Surr: DNOP		118	61.7-135		%REC	1	7/20/2010 2:09:13 PM
EPA METHOD 8015B: GASOLINE R	ANGE						Analyst: NSB
Gasoline Range Organics (GRO)		150	5.0		mg/Kg	1	7/19/2010 4:00:41 PM
Surr. BFB		423	55.2-107	S	%REC	1	7/19/2010 4:00:41 PM
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene		0.32	0.050		mg/Kg	1	7/19/2010 3:39:23 PM
Toluene		2.9	0.050		mg/Kg	1	7/19/2010 3:39:23 PM
Ethylbenzene		0.57	0.050		mg/Kg	1	7/19/2010 3:39:23 PM
Xylenes, Total		5.9	0.10		mg/Kg	1	7/19/2010 3:39:23 PM
Surr: 4-Bromofluorobenzene		159	64.7-120	S	%REC	1	7/19/2010 3:39:23 PM
EPA METHOD 300.0: ANIONS							Analyst: LJB
Chloride		36	15		mg/Kg	10	7/23/2010 2:40:25 AM
EPA METHOD 418.1: TPH							Analyst: JB
Petroleum Hydrocarbons, TR		170	20		mg/Kg	1	7/28/2010

Qualifiers:

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

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

Page I of I

Date: 28-Jul-10

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

NEIL A 9A

Work Order:

1007585

riojeci. NEILA 9A									AA OLK	Order:	1007383
Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: A	nions										
Sample ID: MB-23069		MBLK				Batch ID:	23069	Analys	is Date:	7/23/2010 1	2:03:44 AM
Chloride	ND	mg/Kg	1.5								
Sample ID: MB-23069		MBLK				Batch ID:	23069	Analys	is Date:	7/24/2010	7:28:46 AM
Chloride	ND	mg/Kg	1.5								
Sample ID: LCS-23069		LCS				Batch ID:	23069	Analys	is Date:	7/23/2010 1	2:21:09 AM
Chloride	14.43	mg/Kg	1.5	15	0.5235	92.7	90	110			
Sample ID: LCS-23069		LCS				Batch ID:	23069	Analys	is Date:	7/24/2010	7:46:11 AM
Chloride	13.97	mg/Kg	1.5	15	0.438	90.2	90	110			
Method: EPA Method 418.1: T	PH										
Sample ID: MB-23076		MBLK				Batch ID:	23076	Analys	is Date:		7/20/2010
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: MB-23162		MBLK				Batch ID.	23162	Analys	s Date:		7/27/2010
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-23076		LCS				Batch ID:	23076	Analys	is Date:		7/20/2010
Petroleum Hydrocarbons, TR	110.6	mg/Kg	20	100	0	111	82	114			
Sample ID: LCS-23162		LCS				Batch ID:	23162	Analys	is Date:		7/27/2010
Petroleum Hydrocarbons, TR	92.68	mg/Kg	20	100	0	92.7	82	114			
Sample ID: LCSD-23076		LCSD				Batch ID:	23076	Analys	is Date:		7/20/2010
Petroleum Hydrocarbons, TR	95.68	mg/Kg	20	100	0	95.7	82	114	14.4	20	
Sample ID: LCSD-23162		LCSD				Batch ID:	23162	Analys	is Date:		7/27/2010
Petroleum Hydrocarbons, TR	103.7	mg/Kg	20	100	Q	104	82	114	11.2	20	
Method: EPA Method 8015B: I	Diesel Range	Organics									
Sample ID: MB-23056		MBLK				Batch ID	23056	Analys	is Date:	7/20/2010 1	2:26:37 PM
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-23056		LCS				Batch ID.	23056	Analys	is Date:	7/20/2010	1:00:44 PM
Diesel Range Organics (DRO)	46.31	mg/Kg	10	50	0	92.6	64.6	116			
Sample ID: LCSD-23066		LCSD				Batch ID.	23056	Analys	is Date:	7/21/2010	2:41:14 AM
Diesel Range Organics (DRO)	48.48	mg/Kg	10	50	0	970	64.6	116	4.58	17.4	
Method: EPA Method 8015B: (Gasoline Rar	nge									
Sample ID: 1007585-01A MSD		MSD				Batch ID:	23047	Analys	is Date:	7/19/2010	9:47:43 PM
Gasoline Range Organics (GRO)	185.0	mg/Kg	5.0	25	151.2	135	80	115	25.0	11.6	SR
Sample ID: MB-23047		MBLK				Batch ID:	23047	Analys	is Date:	7/19/2010 1	0:45:23 PM
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-23047		LCS				Batch (D)	23047	Analys	is Date:	7/19/2010 1	0:16.33 PM
Gasoline Range Organics (GRO)	29.13	mg/Kg	5.0	25	0	117	77.8	124			
Sample ID: 1007585-01A MS		MS				Batch ID:	23047	Analys	is Date:	7/19/2010	9:18:46 PM
Gasoline Range Organics (GRO)	143.8	mg/Kg	5 0	25	151.2	-29 8	80	115			S

Qualifiers:

f.stimated value

I Analyte detected below quantitation limits

NU Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

VC Non-Chlormated

R RPD outside accepted recovery limits

Date: 28-Jul-10

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

NEIL A 9A

Work Order:

1007585

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec Lo	owLimit Hig	ghLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8021B: \	/olatiles										
Sample ID: 1007585-01A MSD		MSD				Batch ID:	23047	Analys	sis Date:	7/19/2010	6.41.25 PN
Benzene	1.290	mg/Kg	0.050	1	0.3221	96.8	78.8	132	12.4	27	
Toluene	3.116	mg/Kg	0.050	1	2.898	21.8	78.9	112	3.34	19	S
Ethylbenzene	1.657	mg/Kg	0.050	1	0.5697	109	69.3	125	1.72	10	
Xylenes, Total	7.887	mg/Kg	0.10	3	5.899	66.3	73	128	0.344	13	S
Sample ID: MB-23047		MBLK				Batch ID:	23047	Analys	sis Date:	7/19/2010	7:42:06 PM
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: LCS-23047		LCS				Batch ID:	23047	Analys	sis Date:	7/19/2010	7:11:42 PN
Benzene	0.9763	mg/Kg	0.050	1	0	97.6	78.8	132			
Toluene	1.019	mg/Kg	0.050	1	0.0126	101	78.9	112			
Ethylbenzene	1.082	mg/Kg	0.050	1	0.0116	107	69.3	125			
Xylenes, Total	3.312	mg/Kg	0.10	3	0	110	73	128			
Sample ID: 1007585-01A MS		MS				Batch ID:	23047	Analys	sis Date:	7/19/2010	6:11:06 PN
Benzene	1 139	mg/Kg	0.050	1	0.3221	81.7	78.8	132			
Toluene	3.013	mg/Kg	0.050	1	2.898	11.5	78.9	112			S
Ethylbenzene	1.629	mg/Kg	0.050	1	0.5697	106	69.3	125			
Xylenes, Total	7.914	mg/Kg	0.10	3	5.899	67.2	73	128			S

Qualifiers:

ND Not Detected at the Reporting Limit

NC Non-Chlorinated

R RPD outside accepted recovery limits

Page 2

F Estimated value

J Analyte detected below quantitation limits

H Holding times for preparation or analysis exceeded

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG			Date Received	7/16/2010	
Nork Order Number 1007585			Received by	ARS	
Checklist completed by:	<u>)</u>	7/16 Nate	Sample ID la	ibels checked by:	Initials
Matrix:	Carrier name:	Greyhound			
Shipping container/cooler in good condition?		Yes 🗹	No 🗌	Not Present	
Custody seals intact on shipping container/coole	r?	Yes 🗸	No 🗆	Not Present	Not Shipped
Custody seals intact on sample bottles?		Yes	No	N/A	
Chain of custody present?		Yes 🗹	No 🗌		
Chain of custody signed when relinquished and	received?	Yes 🗹	No 🗌		
Chain of custody agrees with sample labels?		Yes 🗹	No 🗌		
Samples in proper container/bottle?		Yes 🗸	No 🗔		
Sample containers intact?		Yes 🗸	No _		
Sufficient sample volume for indicated test?		Yes 🗸	No 🗌		
All samples received within holding time?		Yes 🗸	No 🗌		Number of preserved
Water - VOA vials have zero headspace?	No VOA vials subm	nitted 🛂	Yes 🗌	No I	bottles checked for pH:
Water - Preservation labels on bottle and cap ma	atch?	Yes _	No 🗌	N/A	
Water - pH acceptable upon receipt?		Yes _	No 🗌	N/A	<2 >12 unless noted below.
Container/Temp Blank temperature?		2.1°	<6° C Acceptable		DEROW
COMMENTS:			If given sufficient	time to cool.	
Client contacted	Date contacted:		Pers	on contacted	
Contacted by:	Regarding:				
Comments					
Corrective Action					

Time Time	Date: Time: Relinquished by: Received by: Date Date: Time: Relinquished by: Received by: Date	VINIO 1130 SOIL 21 BET SPERT 1 X 4 02 COOL	Request ID Container Preservative Type and # Type	□ EDD (Type) Sample Temperature: 3.)	□ NELAP □ Other □ On Ice:	on	☐ Level 4 (Full Validation)	8:	email or Fax# Project Manager:	Phone #: SOS - 632 - 1199	Brankfeld NM Project #	Mailing Address: P.C. Box 87 NEIL A 9A	Project Name:	Client: Bush Bush Bush Ive. XStandard - Rush	
X TPH Method 8015B (Gas/Diesel) Www.hallenvironme	Time		758S												
X TPH Method 8015B (Gas/Diesel) Www.hallenvironme	Rem	×	-												
X TPH Method 8015B (Gas/Diesel) Www.hallenvironme THALL Www.hallenvironme TPH (Method 418.1) Www.hallenvironme Www.hallenvironme TPH (Method 504.1) S310 (PNA or PAH) RCRA 8 Metals Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) ROS2 PCB's Ros2 PCB	* *	100	-	-	d 8015B (Gas/Diesel) d 418.1) d 504.1)						<u>Tel</u>	490			
RCRA 8 Metals Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) ROBA Pesticides / 8082 PCB's ROBA Pesticides / 8082 PCB's	4 320	+	-	-							505	Hav			
RCRA 8 Metals Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) ROBA Pesticides / 8082 PCB's ROBA Pesticides / 8082 PCB's		1									345-	vkins NE	www.h	D	DAL
RCRA 8 Metals Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) ROBA Pesticides / 8082 PCB's ROBA Pesticides / 8082 PCB's		+	1	-							3975			D	
Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) Buquerque, NM 87109 Request 8260B (VOA) 8270 (Semi-VOA) X CHLORIDE	0		1	-						Ama		<u>></u>	allen		
## S LABORATORY S LABORATORY S LABORATORY	0									lysis	Fax	buqu	viror	S	À Z
8260B (VOA) 8270 (Semi-VOA) X CHLORIDE	53		1	081 Pesticides / 8082 PCB's 260B (VOA) 270 (Semi-VOA)								uerque, NM 87	nmental.com		
8270 (Semi-VOA) X CHLORIDE			8260B (VO								-345			2	N O
X CHLORIDE RATORY			8270 (Semi								-410			0	
ATORY		X	CHLORI								7	7109		D	S
R P														OF	
														Z	P

Air Bubbles (Y or N)

Chain-of-Custody Record

Turn-Around Time:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.



