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 87505State of New Mexico State of New Mexico Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a co- to the appropriate NMOCD District Office.	2013 I the
Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application OIL CONS. DIV DIST. 3 Image: Type of action: Image: Below grade tank registration OIL CONS. DIV DIST. 3 Image: Permit of a pit or proposed alternative method JUN 0.2 2015 Image: Permit of a pit, below-grade tank, or proposed alternative method JUN 0.2 2015 Image: Permit of a pit, below-grade tank, or proposed alternative method JUN 0.2 2015 Image: Permit of a pit, below-grade tank, or proposed alternative method JUN 0.2 2015 Image: Permit of a pit or proposed alternative for an existing permit/or registration Image: Permit of a pit, below-grade tank, or proposed alternative method Image: Permit or proposed alternative method Image: Permit or proposed alternative method Image: Permit or proposed alternative method Image: 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 ordinary	nces.
1. Operator: BP America Production CompanyOGRID #:778 Address:200 Energy Court, Farmington, NM 87401 Facility or well name:Case A 18 API Number:3004527812OCD Permit Number: U/L or Qtr/QtrNSection5Township31NRange _11WCounty:San Juan Center of Proposed Design: Latitude36.922346Longitude108.014135NAD: [_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 [Lined Unlined Liner type: Thickness	
3. Selow-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 detectionVisible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls and linerMisble sidewalls onlyOtherMilled/double bottomed 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*)

 \Box Four foot height, four strands of barbed wire evenly spaced between one and four feet

Alternate. Please specify

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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 □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells						
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						
 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	Yes No					
 application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 						
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	🗌 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 						
 Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 						
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 	Yes No					
^{10.} <u>Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist</u> : 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</i> <i>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 19.15.17.12 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.13. 						
Previously Approved Design (attach copy of design) API Number: or Permit Number:						
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 19.15.17.9 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: 						
Previously Approved Design (attach copy of design) API Number: or Permit Number:						

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12. Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC 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 19.15.17.11 NMAC Reergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control 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					
14.						
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a closure plan. Please indicate, by a check mark in the box, that the documents are attached. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	nttached to the					
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. P. 19.15.17.10 NMAC for guidance.						
 Ground water is less than 25 feet below the bottom of the buried waste. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells 	☐ Yes ☐ No ☐ 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						
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells						
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) Topographic map; Visual inspection (certification) of the proposed site						
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image						
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site						
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	Yes No					
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance						

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adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval ob	tained 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 & M Society; Topographic map 	Mineral Resources; USGS; NM Geological					
Within a 100-year floodplain. - FEMA map		Yes No 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 						
 17. Operator Application Certification: I hereby certify that the information submitted with this application is true, accurate and 	d complete to the best of my knowledge and beli	ef.				
Name (Print):	Title:					
Signature:	Date:					
e-mail address:	Telephone:					
18. OCD Approval: Permit Application (including	Conditions (see attachment)					
OCD Permeantative Signatures						

OCD Representative Signature: Approval Date: Title: er: 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: 10/4/2011 20 **Closure Method:** \boxtimes 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

 \boxtimes Site Reclamation (Photo Documentation)

36.922346 -108.014135 On-site Closure Location: Latitude Longitude

NAD: 1927 X 1983

Operator Closure Certification:

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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):Jeff Peace	Title: Field Environmental Coordinator					
Signature: Sff Peore	Date:June 2, 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

<u>Case A 18 – Tank A (95 bbl)</u> <u>API No. 3004527812</u> <u>Unit Letter N, Section 5, T31N, R11W</u>

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

General Closure Plan

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

- 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, Tank A	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	23
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 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.

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. 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.

1000 C C F ID C F DUCOTOS		i St. I faile					
1220 S. St. Francis Dr., Santa Fe, NM 87505	Santa Fe	e, NM 875	05				
Release Noti	ficatior	and Co	orrective A	ction			
		OPERA	FOR	🗌 Initi	al Report	\boxtimes	Final Repo
Name of Company: BP		Contact: Jef	f Peace				
Address: 200 Energy Court, Farmington, NM 87401	,	Telephone 1	No.: 505-326-94	79			
Facility Name: Case A 18]	Facility Typ	e: Natural gas	well			
Surface Owner: Federal Minera	al Owner: I	Fadaral		ADINI	20045279	212	
				APING	b. 30045278	512	
		N OF REI	Feet from the	Fact/Wast Lina	Country C		
Unit LetterSectionTownshipRangeFeet from theN531N11W1,270	South	South Line	1,625	East/West Line West	County: S	an Juan	
Latitude 36.922346		Longitud	e 108.014135				
	ATURE	OF REL	EASE				
Type of Release: none		1	Release: N/A	Volume 1	Recovered: N	J/A	
Source of Release: below grade tank – 95 bbl, Tank A		Date and H	lour of Occurrence	e: Date and	Hour of Dis	covery:	
Was Immediate Notice Given?	t Required	If YES, To	Whom?				
By Whom?		Date and H	our				
Was a Watercourse Reached?			lume Impacting	he Watercourse.			
🗌 Yes 🖾 No							
Describe Area Affected and Cleanup Action Taken.* BGT was backfilled and compacted and is still within the active well area		nd the area u	nderneath the BG	T was sampled. T	he area unde	r the B	GT was
hereby certify that the information given above is true and corregulations all operators are required to report and/or file certai public health or the environment. The acceptance of a C-141 reshould their operations have failed to adequately investigate an or the environment. In addition, NMOCD acceptance of a C-14 cederal, state, or local laws and/or regulations.	n release no eport by the d remediate	otifications ar NMOCD ma contamination	ad perform correct arked as "Final R on that pose a thr	tive actions for rel eport" does not rel eat to ground water	eases which ieve the oper r, surface wa	may en ator of ter, hur	danger liability nan health
0-00 0-			OIL CON	SERVATION	DIVISIC	N	
Signature: 94 Jane			D				
Printed Name: Jeff Peace	<i>I</i>	Approved by	Environmental S	pecialist:			
Fitle: Field Environmental Coordinator	I	Approval Dat	e:	Expiration	Date:		
E-mail Address: peace.jeffrey@bp.com	(Conditions of	Approval:		Attached		
Date: June 2 2015 Phone: 505-326-9479							

* Attach Additional Sheets If Necessary

CLIENT: BP	API #: 3004527812					
FIELD REPORT:	(Circle one): BGT CONFIRMATION / RE	632-1199 LEASE INVESTIGATION / OTHER:		PAGE #:	1 of	1
SITE INFORMATION QUAD/UNIT: N SEC: 5 TWP: 1/4-1/4/FOOTAGE: 1,270'S / 1,62	31N RNG: 11W PM:	# 18 NM CNTY: SJ ST: :: [FEDERAL]/ STATE / FEE / II		DATE STARTED: DATE FINISHED:	09/20	0/11
LEASE #: SF078095	PROD. FORMATION: FT CONT	ELKHORN RACTOR: MBF - C. MCINNE	S	ENVIRONMENTAL SPECIALIST(S):	NJ	
REFERENCE POINT 1) 95 BGT (SW/DB) - A 2) -95 BGT (SW/DB) - B	GPS COORD.: 36.92	ORD.: <u>36.92359 X</u> 3346 X 108.016384 3733 X 108.016672	DISTANCE/BE/	39 GL ELE ARING FROM W.H.:	™: <u>6,1</u> 87', S 105', N	4W
,	GPS COORD.:		DISTANCE/BEA	ARING FROM W.H.:		
SAMPLING DATA: 1) SAMPLE ID: 5PC - TB @ 5' (9) 2) SAMPLE ID: 5PC - TB @ 5' (9) 3) SAMPLE ID:	5-D) SAMPLE DATE: 09/20/11	SAMPLE TIME: 1630 LAB ANALYS	418.1/8	015B/8021/B/30 015B/8021/B/30		OVM READING (ppm) NA
	SAMPLE DATE:		IS:			
SOIL COLOR:	OSE FIRM DENSE / VERY DENSE T / SATURATED / SUPER SATURATED 5 YES NO EXPLANATION -	PLASTICITY (CLAYS): NON PLASTIC / SLIG DENSITY (COHESIVE CLAYS & S HC ODOR DETECTED: YES	ILTS): SOFT	/ FIRM / STIFF / VERY	STIFF / HA	
SOIL IMPACT DIMENSION ESTIMATION: DEPTH TO GROUNDWATER: _ >100' N		X NA ft. EXCAN IEAREST SURFACE WATER: <a>20		IMATION (Cubic Ya D TPH CLOSURE STD		NA _ ppm
SITE SKETCH	WELL HEAD ⊕	PLOT PLAN circle: atta		CALIB. READ. =N CALIB. GAS =N NA am/pm [MISCELL. NO - N1435257 PO - 55397 PK - ZANDECA	Appm)ATE:I NOTI 7	<u>RF = 0.52</u> NA ES
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAV T.B. = TANK BOTTOM; PBGTL = PREVIOUS I NA- NOT APPLICABLE OR NOT AVAILABLE	(95-A) PBGTL T.B. ~5' B.G. ATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW-GRADE TANK LOCATION; SPD = SAMPLI SW- SINGLE WALL; DW- DOUBLE WALL; SB -	E POINT DESIGNATION; R.W. = RETAINING			ble:(Y)/ N	/ NA / NA
TRAVEL NOTES: CALLOUT:		ONSITE: 09/20/11 - Af	ter.			

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Date: 04-Oct-11 Analytical Report

Client Sample ID: 5PC-TB @5' (95 BGT-A) **CLIENT: Blagg** Engineering Lab Order: 1109910 Collection Date: 9/20/2011 4:30:00 PM **Project:** Case A #18 Date Received: 9/23/2011 Matrix: SOIL Lab ID: 1109910-01 Result **PQL** Qual Units DF Analyses **Date Analyzed EPA METHOD 8015B: DIESEL RANGE ORGANICS** Analyst: JB **Diesel Range Organics (DRO)** 23 10 mg/Kg 1 9/28/2011 11:37:58 AM Surr: DNOP 150 73.4-123 %REC 1 9/28/2011 11:37:58 AM S EPA METHOD 8015B: GASOLINE RANGE Analyst: RAA Gasoline Range Organics (GRO) ND 4.6 mg/Kg 1 9/30/2011 3:07:41 AM Surr: BFB 92.6 75.2-136 %REC 1 9/30/2011 3:07:41 AM EPA METHOD 8021B: VOLATILES Analyst: RAA Benzene ND 0.046 mg/Kg 1 9/30/2011 3:07:41 AM Toluene ND 0.046 mg/Kg 1 9/30/2011 3:07:41 AM 0.046 9/30/2011 3:07:41 AM Ethylbenzene ND mg/Kg 1 Xylenes, Total ND 0.093 ma/Ka 1 9/30/2011 3:07:41 AM Surr: 4-Bromofluorobenzene 99.0 80-120 %REC 1 9/30/2011 3:07:41 AM EPA METHOD 300.0: ANIONS Analyst: SRM Chloride ND 1.5 1 9/29/2011 5:52:55 PM mg/Kg

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EPA METHOD 418.1: TPH					Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	9/29/2011

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

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QA/QC SUMMARY REPORT

Client: Blagg Engin	-										
Project: Case A #18									Work	Order:	1109910
Analyte	Result	Units	PQL	SPK V	a SPK ref	%Rec L	.owLimit Hi	ighLimit	%RPD	RPDLimi	t Qual
Method: EPA Method 300.0: A	nions										
Sample ID: MB-28618		MBLK				Batch ID:	28618	Analysi	s Date:	9/29/2011	1:14:20 PM
Chloride	ND	mg/Kg	1.5								
Sample ID: LCS-28618		LCS				Batch ID:	28618	Analysi	s Date:	9/29/2011	1:31:45 PN
Chloride	13.91	mg/Kg	1.5	15	0	92.7	90	110			
Method: EPA Method 418.1: T	РН										
Sample ID: MB-28601		MBLK				Batch ID:	28601	Analysi	s Date:		9/29/2011
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-28601		LCS				Batch ID:	28601	Analysi	s Date:		9/29/2011
Petroleum Hydrocarbons, TR	100.5	mg/Kg	20	100	0	101	87.8	115			
Sample ID: LCSD-28601		LCSD				Batch ID:	28601	Analysi	s Date:		9/29/2011
Petroleum Hydrocarbons, TR	103.2	mg/Kg	20	100	0	103	87.8	115	2.61	8.04	
Method: EPA Method 8015B: I Sample ID: MB-28603	Diesel Range	Organics MBLK				Batch ID:	28603	Analysi	s Date:	9/28/2011	9:54:16 AM
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-28603		LCS				Batch ID:	28603	Analysis	s Date:	9/28/2011	0:28:40 AM
Diesel Range Organics (DRO)	55.22	mg/Kg	10	50	4.175	102	66.7	119			
Method: EPA Method 8015B: 0	Jasoline Ran	ae									
Sample ID: 1109910-01AMSD		MSD				Batch ID:	28595	Analysis	s Date:	9/30/2011 1	1:21:12 PM
Gasoline Range Organics (GRO)	26.71	mg/Kg	4.7	23.26	0	115	72.4	149	3.20	19.2	
Sample ID: MB-28595		MBLK			0	Batch ID:	28595	Analysis		9/29/2011 1	1:45:48 PM
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-28595		LCS				Batch ID:	28595	Analysis	a Date:	9/29/2011 1	0:48:10 PM
Gasoline Range Organics (GRO)	28.48	mg/Kg	5.0	25	0	114	86.4	132			
Sample ID: 1109910-01AMS		MS				Batch ID:	28595	Analysis	Date:	9/30/2011 1	0:52:22 PM
Gasoline Range Organics (GRO)	25.87	mg/Kg	4.8	23.76	0	109	72.4	149			
Method: EPA Method 8021B: V	olatiles										
Sample ID: MB-28595	onachoo	MBLK				Batch ID:	28595	Analysis	a Date:	9/29/2011 1	1:45:48 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-28595		LCS				Batch ID:	28595	Analysis	Date:	9/29/2011 1	1:16:59 PM
Benzene	1.019	mg/Kg	0.050	1	0.0141	100	83.3	107			
Toluene	1.002	mg/Kg	0.050		0.0129	98.9	74.3	115			
Ethylbenzene	1.023	mg/Kg	0.050		0.0136	101	80.9	122			
Xylenes, Total	3.058	mg/Kg	0.10	3	0.0425	101	85.2	123			

Qualifiers:

- E Estimated value
- J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

- H Holding times for preparation or analysis exceeded
- NC Non-Chlorinated

R RPD outside accepted recovery limits

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Sample Receipt Checklist

Client Name BLAGG			Date Received	:		9/23/2011
Work Order Number 1109910			Received by:	DAM	l	
Checklist completed by:		Dat	Sample ID lat e 9/2////	oels checke	d by:	Initials W
Matrix: Ca	arrier name: <u>G</u>	reyhound	1			
Shipping container/cooler in good condition?	Y	es 🗸	No	Not Preser	t	
Custody seals intact on shipping container/cooler?	Y	es 🗸	No	Not Preser	t ·	Not Shipped
Custody seals intact on sample bottles?	Ye	es ^{i !}	No	N/A	V	
Chain of custody present?	Ye	s V	No			
Chain of custody signed when relinquished and received?	Ye Ye	es 🗸	No			
Chain of custody agrees with sample labels?	Ye	es 🔽	No			
Samples in proper container/bottle?	Ye	es 🗸	No			
Sample containers intact?	Ye	s V	No			
Sufficient sample volume for indicated test?	Ye	s 🗸	No			
All samples received within holding time?	Ye	s 🗸	No			Number of preserved
Water - VOA vials have zero headspace? No VOA	A vials submitte	d 🖌	Yes	No		bottles checked for pH:
Water - Preservation labels on bottle and cap match?	Ye	S I	No	N/A 🗸	i,	
Water - pH acceptable upon receipt?	Ye	S	No	N/A .	ŕ	<2 >12 unless noted below.
Container/Temp Blank temperature?		3.3°	<6° C Acceptable			DOIDW.
COMMENTS:			If given sufficient t	ime to cool.		~

Client contacted

Date contacted:

Person contacted

Contacted by:

Regarding:

Comments:

Corrective Action

Chain-of-Custody Record				Turn-Around Time:						E.	14		EI	NV	TE	20		MF	NT		i	
Client: BLAGG ENGR. / BP AMERICA				Standard Rush				ANALYSIS LABORATORY														
				Project Name:				www.hallenvironmental.com														
Mailing Address: P.O. BOX 87			CASE A # 18				4901 Hawkins NE - Albuquerque, NM 87109															
BLOOMFIELD, NM 87413				Project #:				Tel. 505-345-3975 Fax 505-345-4107														
								Analysis Request														
Phone #: (505) 632-1199 email or Fax#:			Project Manager:																			
QA/QC Package:			NELSON VELEZ			481-(8021B)	TPH (Gas only)	is/Diese						PCB's						PLE		
			Sampler: NELSON VELEZ 920			甘	1 (G	3 (Ga	-	-			nce	/ 8082	•					AM		
			On ice: 🔀 Yes 🖂 No				TPH	0156	18.1	504.1)	(HH)		Bala	s / 8		A)	(0)			ITES	or N	
EDD (Type)			Sample Temperature: 3.3				BE +	8 pc	od 4	od 5	or P	itals	iion	cide	A)	0/-	(300		PLE	POS	2 S	
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX +-MTB	BTEX + MTBE	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method	8310 (PNA or PAH)	RCRA 8 Metals	Cation / Anion Balance	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	CHLORIDE (300.0)		GRAB SAMPLE	5 PT. COMPOSITE SAMPLE	Air Bubbles (Y or N)
9/20/11	1630	SOIL	5PC-TB @ 5' (95 BGT-A)	4 oz 2	Cool	1109910-	1		V	٧								V			٧	
	1620	SOIL	5PO-TB @ 5' (95 BOT-B)	4 02 2	Cool	2	V	-	V	¥							_	V		-	V	-
							1	1												-		
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Date:	Time:	Relinguish	ed by:	Received by:		Date Time																
9/22/11	2/1 1530 Mun J			Christin	9/22/11/53			DIREC	ECTLY TO BP:													
Date:				Received by: Date Time Jeff Peace, 200 Energy Court, Farmin 9/23/11 Work Order: <u>N1435257</u> Pay																		
123/11 SID / Mister Valt			1 Juny	AN	71- 71												(1	1.4				

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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 dearly notated on the analytical report.



