

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

13008 Proposed Alternative Method Permit or Closure Plan Application

OIL CONS. DIV DIST. 3

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
45-25145 ☒ 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

JUL 10 2015

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.

Operator: ConocoPhillips Company OGRID #: 217817
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: **STATE E GAS COM 1E**
API Number: 30-045-25145 OCD Permit Number: _____
U/L or Qtr/Qtr A (NENE) Section 16 Township 29N Range 10W County: SAN JUAN
Center of Proposed Design: Latitude 36.73095 °N Longitude -107.88412 °W 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: Thickness _____ mil ☒ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.

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

4.

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

5.

Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)
☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify _____

6.

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

☐ Screen ☐ Netting ☐ Other _____

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

7.

Signs: Subsection C of 19.15.17.11 NMAC

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

☐ Signed in compliance with 19.15.16.8 NMAC

8.

Variations and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

General siting

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

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No
☒ NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☒ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

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

☐ Yes ☐ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

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

☐ Yes ☐ No

Within an unstable area. **(Does not apply to below grade tanks)**

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

☐ Yes ☐ No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

☐ Yes ☐ No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 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).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

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

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

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC

and 19.15.17.13 NMAC

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

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

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

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

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

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

Proposed Closure: 19.15.17.13 NMAC

Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative

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

14.

Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

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

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

☐ Yes ☐ No

Within the area overlying a subsurface mine.

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

☐ Yes ☐ No

Within an unstable area.

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

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

On-Site Closure Plan Checklist: (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.

OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: _____ Approval Date: 7/14/15

Title: Environmental Spec. _____ OCD Permit Number: _____

19.

Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: _____

20.

Closure Method:

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

21.

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

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

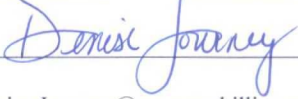
On-site Closure Location: Latitude _____°N _____ Longitude _____°W _____ NAD: ☐ 1927 ☐ 1983

Operator Closure Certification:

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

Name (Print): Denise Journey Title: Staff Regulatory Technician

Signature: _____



Date: _____

7/9/15

e-mail address: Denise.Journey@conocophillips.com Telephone: (505) 326-9556

ConocoPhillips Company
San Juan Basin
Below Grade Tank Closure Report
(Without Reclamation)

Lease Name: State E Gas Com 1E
API No.: 30-045-25145

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

General Plan:

1. COPC shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**
3. COPC shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

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

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

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

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

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

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

7. A five point composite sample was taken of the below-grade tank using sample per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached).

only 1 sample

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

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

A release was/was not determined for the above referenced well.

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

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

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

Notice of Corrective Action Sampling attached.

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

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

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

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

13. COPC Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will be used on federally regulated lands and division-approved seed mixtures

(administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

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

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

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

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

From: Notor, Lori
To: Smith, Cory, EMNRD
Subject: FW: Notification of Corrective Action- Sampling of Soil in Backfilled Below-Grade Tank Excavation- State E Gas Com 1E
Date: Wednesday, June 03, 2015 3:41:00 PM
Attachments: 2008 State E Gas Com 1E Approved Closure Plan.pdf

Cory,

Please note the corrected operator information below.

Thank you!

Lori Notor

Regulatory Supervisor

San Juan Business Unit

ConocoPhillips Company

Desk: (505) 326-9822

Mobile: (505) 258-5676

lori.r.notor@cop.com

From: Notor, Lori
Sent: Wednesday, June 03, 2015 3:40 PM
To: Smith, Cory, EMNRD
Cc: Ellison, Stephen G. (LDZX); Bruner, John P; Tafoya, Crystal
Subject: Notification of Corrective Action- Sampling of Soil in Backfilled Below-Grade Tank Excavation- State E Gas Com 1E

Subject: Notification- Soil Sampling of Backfilled Below-Grade Tank Excavation

Anticipated Start Date: June 8, 2015

In reponse to Violation 3 of Notice of Violation (3-15-01), ConocoPhillips Company will conduct sampling and analysis of soil from the backfilled below-grade tank excavation at State E Gas Com 1E. ConocoPhillips Company will follow the below protocol that was approved by New Mexico Oil

Conservation Division on May 22, 2015. The protocol is as follows:

- One soil sample will be taken using a hand auger at the center of the backfilled BGT excavation at a depth of eight feet, or 1 foot deeper than the first indication of contamination. Historical GoogleEarth imagery indicates the center of the pit excavation was located at the following coordinates: 36.73096°, -107.88412°.
- Soil samples will be analyzed for the constituents listed in item 5 of the Below-Grade Tank Closure Plan for State E Gas Com 1E (see attached). ConocoPhillips Company will adhere to the methods and closure standards defined in this plan.
- Should constituent levels exceed standards referenced in the Closure Plan, the requirements in 19.15.3.116 NMAC and 19.15.1.19 NMAC will be followed, as appropriate.

Well Name: State E Gas Com 1E

API#: 30-045-25145

Location: UL A, Sec. 16, T29N, R10W

Footages: 800' FNL & 800' FEL

Operator: COP

Surface Owner: State

In addition, we wanted to let you know the internal audit we are conducting is progressing on-schedule. We intend to self-report to OCD by the June 15, 2015 deadline we discussed during our administrative conference.

Respectfully,

Lori Notor

Regulatory Supervisor

San Juan Business Unit

ConocoPhillips Company

Desk: (505) 326-9822

Mobile: (505) 258-5676

lori.r.notor@cop.com

From: [Smith, Cory, EMNRD](#)
To: [Notor, Lori](#)
Cc: [Perrin, Charlie, EMNRD](#); [Powell, Brandon, EMNRD](#)
Subject: [EXTERNAL]RE: Proposed Protocol for Sampling Soil from Backfilled Below-Grade Tank Excavations
Date: Friday, May 22, 2015 2:38:28 PM

Mrs. Notor,

Please see the following Concerns in regards to the below email;

COPC - "One soil sample will be taken at the center of the backfilled BGT excavation at a depth of five feet. Our most frequently used below-grade tank standard includes a four-foot tall, 120-BBL tank on six inch I-beams. We believe sampling at a depth of five feet will be sufficient to test for soil contamination Below the depth at which such a tank would have been installed."

The OCD is concerned that although each BGT is designed to be installed using the approved design plan, as built site conditions often vary. OCD will require the sampling a depth of eight feet or 1' greater than first indication of contamination. This will also ensure if a contamination plume originated on the edge of the BGT location it would likely migrate over and be shown in the deeper auger point.

COPC - "A hand auger will be used to collect this sample. Coordinates of the center of the historical excavation will be determined, to five decimal places, using GoogleEarth's historical satellite imagery."

The Google Earth coordinates will need to be compared to what was supplied in the C-144. If the Below Grade Tank, is located in a different location then what was supplied in the C-144, COPC will need to explain the difference. Please be aware if the coordinates are different the site will be reviewed and sampling at both locations may be required.

COPC - "We will analyze the soil sample for the constituents listed in item 5 of the Below-Grade Tank Closure Plan for State E Gas Com 1E, and will adhere to the methods and closure standards defined in this plan. Should constituent levels exceed standards in the Closure Plan, we will follow the guidelines established in OCD's Environmental Handbook, Section 7b."

Instead of the above reference, if COPC discovers contamination exceeding limits COPC will be required to proceed in accordance with item #6 of the approved closure plan.

COPC - "We further request OCD's approval of this protocol for use in all cases where sampling of a backfilled BGT excavation is necessary"

OCD will approve the use of this procedure and all the conditions stated above for all cases identified in the audit. The audit should identify all tanks improperly closed prior to the Administrative conference held on April 27, 2015. All cases thereafter will be handled separately on a case by case basis.

If you have any questions please give me a call.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Notor, Lori [<mailto:Lori.R.Notor@conocophillips.com>]
Sent: Thursday, May 21, 2015 8:29 AM
To: Perrin, Charlie, EMNRD
Cc: Bruner, John P; Zubrod, Sharon R; Cardoza, Clara M
Subject: Proposed Protocol for Sampling Soil from Backfilled Below-Grade Tank Excavations

Dear Mr. Perrin:

In anticipation of an agreed compliance order from New Mexico Oil Conservation Division (OCD) regarding Notice of Violation (3-15-01), ConocoPhillips Company would like to take proactive steps to resolve Violation 7 for State E Gas Com 1E by sampling the soil in the backfilled below-grade tank (BGT) excavation at this site.

To that end, we are proposing a soil sampling protocol for OCD's review and approval. The proposed protocol is as follows:

One soil sample will be taken at the center of the backfilled BGT excavation at a depth of five feet. Our most frequently used below-grade tank standard includes a four-foot tall, 120-BBL tank on six inch I-beams. We believe sampling at a depth of five feet will be sufficient to test for soil contamination below the depth at which such a tank would have been installed.

A hand auger will be used to collect this sample. Coordinates of the center of the historical excavation will be determined, to five decimal places, using GoogleEarth's historical satellite imagery.

We will analyze the soil sample for the constituents listed in item 5 of the Below-Grade Tank Closure Plan for State E Gas Com 1E, and will adhere to the methods and closure standards defined in this plan. Should constituent levels exceed standards in the Closure Plan, we will follow the guidelines established in OCD's Environmental Handbook, Section 7b.

We further request OCD's approval of this protocol for use in all cases where sampling of a backfilled BGT excavation is necessary.



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

June 16, 2015

Stephanie Hinds
Animas Environmental
604 Pinon Street
Farmington, NM 87401
TEL: (505) 564-2281
FAX

RE: Conoco Phillips State E Gas Com #1E

OrderNo.: 1506381

Dear Stephanie Hinds:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/9/2015 for the analyses presented in the following report.

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** Animas Environmental**Client Sample ID:** SB-1**Project:** Conoco Phillips State E Gas Com #1E**Collection Date:** 6/8/2015 2:00:00 PM**Lab ID:** 1506381-001**Matrix:** SOIL**Received Date:** 6/9/2015 7:15:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH							Analyst: TOM
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	6/15/2015	19676
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	170	30		mg/Kg	20	6/11/2015 11:34:45 AM	19681
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Toluene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Ethylbenzene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Xylenes, Total	ND	0.098		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Surr: 4-Bromofluorobenzene	98.7	80-120		%REC	1	6/11/2015 1:12:49 PM	19635

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental

Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19681	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	19681	RunNo:	26791					
Prep Date:	6/11/2015	Analysis Date:	6/11/2015	SeqNo:	799000	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-19681	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	19681	RunNo:	26791					
Prep Date:	6/11/2015	Analysis Date:	6/11/2015	SeqNo:	799001	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	96.4	90	110			

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental
Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19676	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH						
Client ID:	PBS	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800655	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	ND	20									

Sample ID	LCS-19676	SampType:	LCS	TestCode:	EPA Method 418.1: TPH						
Client ID:	LCSS	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800656	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	110	20	100.0	0	108	86.7	126				

Sample ID	LCSD-19676	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH						
Client ID:	LCSS02	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800657	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	170	20	100.0	0	167	86.7	126	42.6	20	RS	

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental
Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19635	SampType: MBLK			TestCode: EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID: 19635			RunNo: 26776					
Prep Date:	6/9/2015	Analysis Date: 6/11/2015			SeqNo: 798420		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.93		1.000		93.1	80	120			

Sample ID	LCS-19635		SampType: LCS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	LCSS		Batch ID: 19635		RunNo: 26776					
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798421		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	106	76.6	128			
Toluene	1.1	0.050	1.000	0	108	75	124			
Ethylbenzene	1.0	0.050	1.000	0	99.6	79.5	126			
Xylenes, Total	2.9	0.10	3.000	0	96.7	78.8	124			
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Sample ID	1506381-001AMS		SampType: MS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	SB-1		Batch ID: 19635		RunNo: 26776					
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798424		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.82	0.050	0.9921	0	83.2	69.2	126			
Toluene	0.95	0.050	0.9921	0	95.7	65.6	128			
Ethylbenzene	0.91	0.050	0.9921	0	91.4	65.5	138			
Xylenes, Total	2.7	0.099	2.976	0	89.5	63	139			
Surr: 4-Bromofluorobenzene	1.1		0.9921		106	80	120			

Sample ID	1506381-001AMSD		SampType: MSD		TestCode: EPA Method 8021B: Volatiles						
Client ID:	SB-1		Batch ID: 19635		RunNo: 26776						
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798425		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	1.0	0.050	1.000	0	103	69.2	126	22.1	18.5	R	
Toluene	1.1	0.050	1.000	0	106	65.6	128	11.1	20.6		
Ethylbenzene	1.0	0.050	1.000	0	99.9	65.5	138	9.61	20.1		
Xylenes, Total	2.9	0.10	3.000	0	97.0	63	139	8.78	21.1		
Surr: 4-Bromofluorobenzene	1.2		1.000		117	80	120	0	0		

Qualifiers:

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

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



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

Sample Log-In Check List

Client Name: Animas Environmental

Work Order Number: 1506381

RcptNo: 1

Received by/date:

LM

06/09/15

Logged By: Celina Sessa

6/9/2015 7:15:00 AM

Celina Sessa

Completed By: Celina Sessa

6/9/2015 8:57:42 AM

Celina Sessa

Reviewed By:

[Signature]

albalis

Chain of Custody

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

Log In

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

Special Handling (if applicable)

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

Person Notified:

Date

By Whom:

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.3	Good	Yes			

Client: Animas Environmental Services, LLC

Mailing Address: 604 W. Pinon St,
Farmington NM 87401

Phone #: 508-564-2281

email or Fax#: 505 - 324 - 2022

QA/QC Package:

☒ Standard ☐ Level 4 (Full Validation)

Accreditation

☐ NELAP ☐ Other☐ EDD (Type)

Turn-Around Time:

☒ Standard ☐ Rush

Project Name: ConocoPhillips
State E Gas Com #1E

Project #:

Project Manager:

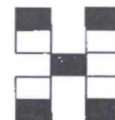
S. Hinds / E. Skyles

Sampler: S. Glasses

On Ice: ☒ Yes ☐ No

Sample Temperature: 3.3

Date:	Time:	Relinquished by:	Received by:	Date	Time	Remarks:
6/8/15	1750	[Signature]	Christine Waelen	6/8/15	1750	
Date:	Time:	Relinquished by:	Received by:	Date	Time	
6/8/15	1834	Christine Waelen	[Signature]	6/8/15	1715	AES will call with additional billing information when it becomes available.



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

[illegible]

Remarks: Bill to Conoco Phillips.

AES will call with additional billing information when it becomes available.



June 29, 2015

Crystal Walker
ConocoPhillips
San Juan Business Unit
(505) 326-9837

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

**RE: Below Grade Tank Closure Report
State E Gas Com #1E
San Juan County, New Mexico**

Dear Ms. Walker:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) State E Gas Com #1E, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – State E Gas Com #1E

Legal Description – NE¼ NE¼, Section 16, T29N, R10W, San Juan County, New Mexico

Well Latitude/Longitude – N36.73132 and W107.88417, respectively

BGT Latitude/Longitude – N36.73098 and W107.88416, respectively

Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, June 2015

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 10 based on the following factors:

604 W. Piñon St.
Farmington, NM 87401
505-564-2281

1911 Main, Ste 280
Durango, CO
970-403-3084

- **Depth to Groundwater:** A BGT permit (C-144) form dated February 2015 reported the depth to groundwater at 247 feet below ground surface (bgs). (0 points)
- **Wellhead Protection Area:** The tank location is not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** An unnamed wash that ultimately drains to the wash in Slane Canyon and then to San Juan River is located approximately 300 feet southeast of the location. (10 points)

1.3 BGT Closure Assessment

AES was initially contacted by Crystal Walker of CoP on June 3, 2015, and on June 8, 2015, Sam Glasses of AES mobilized to the location. Using a hand auger, AES personnel collected one discrete sample from the center of the backfilled BGT footprint from below the former BGT liner.

2.0 Soil Sampling

On June 8, 2015, AES personnel conducted field sampling and collected one sample (SB-1) from below the BGT. The soil sample was collected from approximately 0.5 feet below the former BGT, or a total depth of 7.5 feet. Soil sample SB-1 was field screened for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) and was submitted for confirmation laboratory analysis. The soil sample location is included on Figure 2.

2.1 Field Sampling

2.1.1 Volatile Organic Compounds

A portion of SB-1 was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil sample SB-1 was also analyzed in the field for TPH per U.S. Environmental Protection Agency (USEPA) Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

2.2 Laboratory Analyses

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

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per USEPA Method 8021B;
- TPH per USEPA Method 418.1; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM were measured at 0.1 ppm in SB-1, and field TPH concentrations were reported at 36.0 mg/kg. Field sampling results are summarized in Table 1 and presented on Figure 2. The AES Field Sampling Report is attached.

Table 1. Soil Field VOCs, TPH, and Chloride Results
State E Gas Com #1 BGT Closure, June 2015

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
NMOC D Action Level (NMAC 19.15.17.13E)			--	100	250
SB-1	6/8/15	7.5	0.1	29.0	NA

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SB-1 as less than 0.049 mg/kg and 0.245 mg/kg, respectively. TPH concentrations were reported at less than 20 mg/kg. The laboratory chloride concentration was reported at 170 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. The laboratory analytical report is attached.

Table 2. Soil Laboratory Analytical Results
State E Gas Com #1 BGT Closure, June 2015

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth (ft)</i>	<i>Benzene (mg/kg)</i>	<i>Total BTEX (mg/kg)</i>	<i>TPH (mg/kg)</i>	<i>Chlorides (mg/kg)</i>
NMOC D Action Level (NMAC 19.15.17.13E)			0.2	50	100	250
SB-1	6/8/15	7.5	<0.049	<0.245	<20	170

3.0 Conclusions and Recommendations

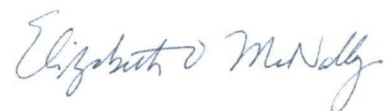
NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations in SB-1 were below the NMOCD action level of 100 mg/kg, with a concentration reported at 36.0 mg/kg. Benzene and total BTEX concentrations were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SB-1 were below the NMOCD action level of 250 mg/kg. Based on field sampling and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at State E Gas Com #1.

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

Sincerely,



David J. Reese
Environmental Scientist

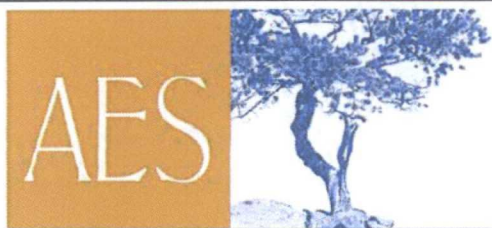
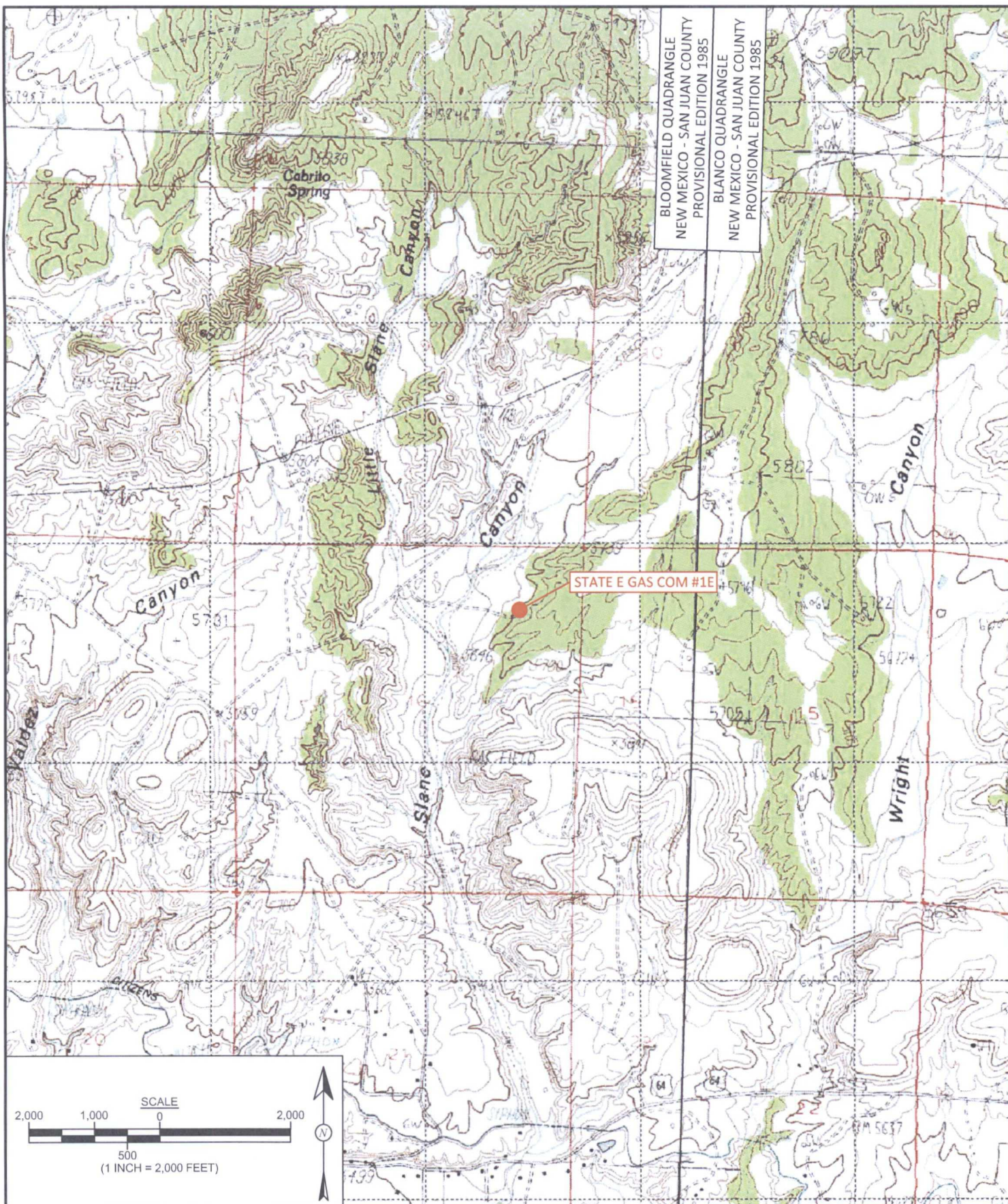


Elizabeth McNally, P.E.

Attachments:

- Figure 1. Topographic Site Location Map
- Figure 2. Aerial Site Map, June 2015
- AES Field Sampling Report 060815
- Hall Analytical Report 1506381

R:\Animas 2000\Dropbox (Animas Environmental)\0000 Animas Server Dropbox EM\2015
Projects\ConocoPhillips\State E Gas Com 1E\State E Gas Com #1E BGT Closure Report 062915.docx



Animas Environmental Services, LLC

DRAWN BY: S. Glasses	DATE DRAWN: June 15, 2015
REVISIONS BY: C. Lameman	DATE REVISED: June 15, 2015
CHECKED BY: E. Skyles	DATE CHECKED: June 15, 2015
APPROVED BY: E. McNally	DATE APPROVED: June 15, 2015

LEGEND

● SAMPLE LOCATIONS

Field Sampling Results

Sample ID	Date	Depth (ft)	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL			--	100	250
SB-1	6/8/15	7.5	0.1	36.0	NA

NA - NOT ANALYZED

Laboratory Analytical Results

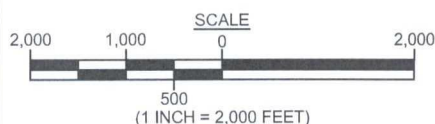
Sample ID	Date	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL			0.2	50	100	250
SB-1	6/8/15	7.5	<0.049	<0.245	<20.0	170

SAMPLE WAS ANALYZED PER USEPA METHOD 8021B, 418.1 AND 300.0.

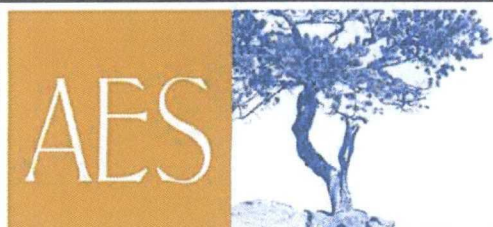
STATE E GAS COM #1E WELL MONUMENT

SB-1

FORMER BGT -
N36.73095, W107.88412



AERIAL SOURCE: © 2014 GOOGLE EARTH PRO, AERIAL DATE: MARCH 15, 2015



Animas Environmental Services, LLC

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S. Glasses

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June 15, 2015

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June 15, 2015

CHECKED BY:
E. Skyles

DATE CHECKED:
June 15, 2015

APPROVED BY:
E. McNally

DATE APPROVED:
June 15, 2015

FIGURE 2

AERIAL SITE MAP
BELOW GRADE TANK CLOSURE
JUNE 2015

ConocoPhillips
STATE E GAS COM #1E
NE ¼ NE¼, SECTION 16, T29N, R10W
SAN JUAN COUNTY, NEW MEXICO
N36.73132, W107.88417

AES Field Sampling Report

Animas Environmental Services, L

Client: ConocoPhillips

Project Location: State E Gas Com #1E

Date: 6/8/2015

Matrix: Soil

Sample ID	Collection Date	Collection Time	Sample Location	OVM (ppm)	Field Chloride (mg/kg)	Field TPH* (mg/kg)	Field TPH Analysis Time	TPH PQL (mg/kg)
SC-1	6/8/2015	14:00	Composite	0.1	NA	36.0	14:25	20.0

DF Dilution Factor

NA Not Analyzed

PQL Practical Quantitation Limit

**Field TPH concentrations recorded may be below PQL.*

Field Chloride - Quantab Chloride Titri

Titration with Silver Nitrate

Total Petroleum Hydrocarbons - USEP

Analyst:





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

June 16, 2015

Stephanie Hinds
Animas Environmental
604 Pinon Street
Farmington, NM 87401
TEL: (505) 564-2281
FAX

RE: Conoco Phillips State E Gas Com #1E

OrderNo.: 1506381

Dear Stephanie Hinds:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/9/2015 for the analyses presented in the following report.

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1506381

Date Reported: 6/16/2015

CLIENT: Animas Environmental

Client Sample ID: SB-1

Project: Conoco Phillips State E Gas Com #1E

Collection Date: 6/8/2015 2:00:00 PM

Lab ID: 1506381-001

Matrix: SOIL

Received Date: 6/9/2015 7:15:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH							Analyst: TOM
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	6/15/2015	19676
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	170	30		mg/Kg	20	6/11/2015 11:34:45 AM	19681
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Toluene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Ethylbenzene	ND	0.049		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Xylenes, Total	ND	0.098		mg/Kg	1	6/11/2015 1:12:49 PM	19635
Surr: 4-Bromofluorobenzene	98.7	80-120		%REC	1	6/11/2015 1:12:49 PM	19635

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

Qualifiers:

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

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental

Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19681	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	19681	RunNo:	26791					
Prep Date:	6/11/2015	Analysis Date:	6/11/2015	SeqNo:	799000	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-19681	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	19681	RunNo:	26791					
Prep Date:	6/11/2015	Analysis Date:	6/11/2015	SeqNo:	799001	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	96.4	90	110			

Qualifiers:

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- E Value above quantitation range
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- S Spike Recovery outside accepted recovery limits

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- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental
Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19676	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH						
Client ID:	PBS	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800655	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	ND	20									

Sample ID	LCS-19676	SampType:	LCS	TestCode:	EPA Method 418.1: TPH						
Client ID:	LCSS	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800656	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	110	20	100.0	0	108	86.7	126				

Sample ID	LCSD-19676	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH						
Client ID:	LCSS02	Batch ID:	19676	RunNo:	26840						
Prep Date:	6/11/2015	Analysis Date:	6/15/2015	SeqNo:	800657	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	170	20	100.0	0	167	86.7	126	42.6	20	RS	

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1506381

16-Jun-15

Client: Animas Environmental

Project: Conoco Phillips State E Gas Com #1E

Sample ID	MB-19635	SampType: MBLK			TestCode: EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID: 19635			RunNo: 26776					
Prep Date:	6/9/2015	Analysis Date: 6/11/2015			SeqNo: 798420		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.93		1.000		93.1	80	120			

Sample ID	LCS-19635		SampType: LCS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	LCSS		Batch ID: 19635		RunNo: 26776					
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798421		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	106	76.6	128			
Toluene	1.1	0.050	1.000	0	108	75	124			
Ethylbenzene	1.0	0.050	1.000	0	99.6	79.5	126			
Xylenes, Total	2.9	0.10	3.000	0	96.7	78.8	124			
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Sample ID	1506381-001AMS		SampType: MS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	SB-1		Batch ID: 19635		RunNo: 26776					
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798424		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.82	0.050	0.9921	0	83.2	69.2	126			
Toluene	0.95	0.050	0.9921	0	95.7	65.6	128			
Ethylbenzene	0.91	0.050	0.9921	0	91.4	65.5	138			
Xylenes, Total	2.7	0.099	2.976	0	89.5	63	139			
Surr: 4-Bromofluorobenzene	1.1		0.9921		106	80	120			

Sample ID	1506381-001AMSD		SampType: MSD		TestCode: EPA Method 8021B: Volatiles						
Client ID:	SB-1		Batch ID: 19635		RunNo: 26776						
Prep Date:	6/9/2015		Analysis Date: 6/11/2015		SeqNo: 798425		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	1.0	0.050	1.000	0	103	69.2	126	22.1	18.5	R	
Toluene	1.1	0.050	1.000	0	106	65.6	128	11.1	20.6		
Ethylbenzene	1.0	0.050	1.000	0	99.9	65.5	138	9.61	20.1		
Xylenes, Total	2.9	0.10	3.000	0	97.0	63	139	8.78	21.1		
Surr: 4-Bromofluorobenzene	1.2		1.000		117	80	120	0	0		

Qualifiers:

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

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

Sample Log-In Check List

Client Name: **Animas Environmental**

Work Order Number: **1506381**

RcptNo: 1

Received by/date: **LM**

06/09/15

Logged By: **Celina Sessa**

6/9/2015 7:15:00 AM

Celina Sessa

Completed By: **Celina Sessa**

6/9/2015 8:57:42 AM

Celina Sessa

Reviewed By:

[Signature]

06/09/15

Chain of Custody

1. Custody seals intact on sample bottles?

Yes ☐

No ☐

Not Present ☒

2. Is Chain of Custody complete?

Yes ☒

No ☐

Not Present ☐

3. How was the sample delivered?

Courier

Log In

4. Was an attempt made to cool the samples?

Yes ☒

No ☐

NA ☐

5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C

Yes ☒

No ☐

NA ☐

6. Sample(s) in proper container(s)?

Yes ☒

No ☐

7. Sufficient sample volume for indicated test(s)?

Yes ☒

No ☐

8. Are samples (except VOA and ONG) properly preserved?

Yes ☒

No ☐

9. Was preservative added to bottles?

Yes ☐

No ☒

NA ☐

10. VOA vials have zero headspace?

Yes ☐

No ☐

No VOA Vials ☒

11. Were any sample containers received broken?

Yes ☐

No ☒

of preserved
bottles checked
for pH:

(<2 or >12 unless noted)

12. Does paperwork match bottle labels?

(Note discrepancies on chain of custody)

Yes ☒

No ☐

Adjusted?

13. Are matrices correctly identified on Chain of Custody?

Yes ☒

No ☐

14. Is it clear what analyses were requested?

Yes ☒

No ☐

15. Were all holding times able to be met?

(If no, notify customer for authorization.)

Yes ☒

No ☐

Checked by:

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order?

Yes ☐

No ☐

NA ☒

Person Notified:

Date

By Whom:

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.3	Good	Yes			

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.



CenocoPhillips Company
STATE & GAS COM 'E' PK
E-8510
API NO. 30-045-25145
NE 1/4, S00° 30' E, R00° 30' E
SEC. 16, T10N 34N, R10W, S00E
SAN JUAN COUNTY, NEW MEXICO
LATE 1970S TO 1980S
ENVIRONMENTAL NUMBER 1001 274-074
NO DRILLING NO PRODUCTION

