District I
1 525 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or

Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration OIL CONS. DIV DIST. 3
Permit of a pit or proposed alternative method
45-09376 Closure of a pit, below-grade tank, or proposed alternative method JUN 0 2 2015
☐ Modification to an existing permit/or registration
Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank,
or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
lease be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the
nvironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP America Production CompanyOGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Florance O 20
API Number:3004509376OCD Permit Number:
U/L or Qtr/QtrB Section24 Township30N Range9W County:San Juan
Center of Proposed Design: Latitude36.80138 Longitude107.72798 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 Tank B
Volume:21.0bbl Type of fluid:Produced water
Tank Construction material:Steel
Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _Single walled/double bottomed
Liner type: Thicknessmil
4.
Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

s. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify	, hospital,
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.	
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 acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ 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
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	☐ 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
	LI TES LI NO
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	NMAC 15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
### Attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including 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	
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only)	luid Management Pit
☐ 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 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	attached 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	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. Written confirmation or verification from the municipality; Written approval obtained from the municipality	Yes No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
16.	
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan a check mark in the box, that the documents are attached. □ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC □ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC □ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17. □ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC □ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
Operator Application Certification: I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and believed.	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address: Telephone:	
OCD Approval: Permit Application (including glosure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 7/20 Title: OCD Permit Number:	/2015
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date:4/5/2011	the closure report. complete this
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-lo ☐ If different from approved plan, please explain.	op systems only)
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in 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	dicate, by a check
Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude 36.80138 Longitude -107.72798 NAD: 192	7 M 10e2

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

Florance O 20, BGT Tank B (21 bbl)
API No. 3004509376
Unit Letter B, Section 24, T30N, R9W

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

General Closure Plan

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
 - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
 - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)

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

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

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

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

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method	Release Verification	Sample
	21 bbl BGT, Tank B	(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	30
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 were below the stated limits. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**
- If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
 Sampling results indicate no release occurred.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

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

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

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

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

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

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

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

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

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

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

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation.

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

Certification section of C-144 has been completed.

<u>District I</u> 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

Revised August 8, 2011

Form C-141

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

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

			Rele	ease Notifi	catio	n and Co	orrective A	ction				
						OPERA'	TOR		Initi	al Report		Report
Name of Co	ompany: B	P				Contact: Jet	ff Peace					
		Court, Farmi	ngton, N	M 87401		Telephone 1	No.: 505-326-94	179				
Facility Na	me: Floran	ce O 20				Facility Typ	e: Natural gas v	well				
Surface Ow	ner: Feder	al		Mineral (Owner:	Federal			API No	. 3004509376	5	
				LOC	ATIO	N OF RE	LEASE					
Unit Letter B	Section 24	Township 30N	Range 9W	Feet from the 990		/South Line	Feet from the 1,650	East/W East	est Line	County: San	Juan	
		Lati	tude3	6.80138		_ Longitud	e 107.72798					
				NAT	TURE	OF REL	EASE					
Type of Rele	ease: none			11723			Release: N/A		Volume F	Recovered: N/A		
		grade tank –	21 bbl, Ta	ank B			Hour of Occurrence			Hour of Discov		
Was Immedi	ate Notice (Yes	No Not R	equired	If YES, To	Whom?					
By Whom?						Date and F	Iour					
Was a Water	course Reac		Yes 🛚	No		If YES, Vo	olume Impacting t	he Water	course.			
If a Watercou	urse was Im	pacted, Descri	be Fully.*	•								
		*										
							the BGT was dor is results are attac		removal t	to ensure no so	l impacts fr	om
				en.* BGT was re active well area.	emoved a	and the area u	nderneath the BG	T was sa	mpled. Th	ne area under th	e BGT was	}
regulations al public health should their conthe environ	Il operators and or the environment. In a	are required to onment. The ave failed to a	report an acceptanc dequately CD accept	d/or file certain re of a C-141 repo	elease nort by the emediat	otifications are e NMOCD m e contaminati	knowledge and used perform correct arked as "Final Regon that pose a three the operator of r	tive action eport" do eat to gro	ons for rele es not reli ound water	eases which ma eve the operato , surface water,	y endanger r of liability human hea	y
	0	^					OIL CONS	SERVA	ATION	DIVISION		
Signature:	JORG	Pasel										
Printed Name	e: Jeff Peace					Approved by	Environmental Sp	pecialist:				
Title: Field E	nvironment	al Coordinato	•			Approval Dat	e:	E	xpiration I	Date:		
E-mail Addre	ess: peace.je	ffrey@bp.con	1			Conditions of	Approval:			Attached []	
Date: June 2	2015	P	hone: 505	-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP		ENGINEERI , BLOOMFIE		7/13	API #: 300	4509376
OLILIVI		(505) 632-119		7410	TANK ID (if applicble):	A& B
FIELD REPORT:	(circle one): BGT CONFIRMAT	10N RELEASE INVESTI	GATION / OTHER	:	PAGE #:	1 of 1
SITE INFORMATION	SITE NAME: FLC	DRANCE O #2	20		DATE STARTED:	03/17/11
QUAD/UNIT: B SEC: 24 TWP:	30N RNG: 9W	PM: NM CNTY: \$	SJ st: N	M	DATE FINISHED:	03/18/11
1/4 - 1/4/FOOTAGE: 990'N / 1,650' LEASE #: SF078201	E NW/NE LE PROD. FORMATION: M		STATE / FEE ELKHORN MBF - D. HARRIS		ENVIRONMENTAL SPECIALIST(S):	NJV
REFERENCE POINT	- WELL HEAD (W.H.			9X 107.7278	38 GLELE	5,830'
1) -95 BCT (SW/DB) - A	GPS COORD.:	36.80093 X 10			ARING FROM W.H.:	104', S21.5W
21 BGT (SW/DB) - B	GPS COORD.:	36.80138 X 10	7.72798	DISTANCE/BEA	ARING FROM W.H.:	70', N30W
3)	GPS COORD.:			DISTANCE/BEA	ARING FROM W.H.:	
4)	GPS COORD.:			DISTANCE/BEA	ARING FROM W.H.:	
LAB INFORMATION:	CHAIN OF CUSTODY RECORD	(S) # OR LAB USED:	HALL			OVM READING
1) SAMPLE ID: 5 PC-TB @ 6' (21	BGT) SAMPLE DATE: 03	/17/11 SAMPLE TIME:	1515 LAB AN	VALYSIS: 418.1/8	015B/8021B/30	0.0 (CI) NA
2) SAMPLE ID: 5 PC-TB @ 7.5' (95		SAMPLE TIME:	0915 LABAN	VALYSIS: 418.1/8	015B/8021B/30	, ,
3) SAMPLE ID: GS - SC @ 9' (95	BGT) SAMPLE DATE: 03	/10/11 SAMPLE TIME:	0945 LABAN	VALYSIS: 418.1/8	015B/8021B/30	0.0 (Cl) 0.0
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB AN	NALYSIS:		
SOIL DESCRIPTION	SOIL TYPE: SAND	SILTY SAND SILT / SIL	TY CLAY / CLAY	/ GRAVEL / OTH	HER	
SOIL COLOR: PALE YELLOWISH ORA						
COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC					C / COHESIVE / MEDIUM PL / FIRM / STIFF / VERY	
MOISTURE: DRY SLIGHTLY MOIST MOIST/W			R DETECTED: Y			GIII / HARD
SAMPLE TYPE: TRANS COMPOSITE #					90000 400 (2000)	
DISCOLORATION/STAINING OBSERVED		-4" THICK INTERVA	L@30UTHERN	PORTION OF	95 BGT ANNULAR	SPACING
ANY AREAS DISPLAYING WETNESS: NO.		TION OF ANNULAR SP	ACE OF 95 BGT	-		
ADDITIONAL COMMENTS: SAND IN 95			NT OF IMPACTE	D SOILS OBSE	RVED WITHIN RET	TAINING
WALL & 35 BOT BOTTOM (- 4" THICK	X 52 9Q. FT.). ESTIMATED	<1 C.Y. GRAD SAMP	LE COLLECTE	9 1' BELOW IM	PACTED SOILS (Sn	d SAMPLE ID).
EXCAVATION DIMENSIONS (if applicable DEPTH TO GROUNDWATER: _>100' N		NA ft. X N	ACE WATER: <1		cavated (if applicable): D TPH CLOSURE STD:	NA
SITE SKETCH		(24) PLOT PI	LAN circle: at	ttached 0VM	CALIB. READ. = 52	.8- ppm RF = 0.52
		(21) PBGTL			CALIB. GAS =	KF = 0.52
		B. ~ 6' B.G.		N TIME:	9:50 ampm D	OATE: 03/18/41
	ROD.	BERM			MISCELL.	NOTES
				١v	NO - N1073331	1
	~			F	PO - 34353	
	⊕ WELL				PK - ZANDECA	ALSL
	HEAD			_		
SEF	PARATOR	<u> </u>		-	!t D. t	(B)
		COMPRESS	SOR		ermit Date: 0 CD Appr. Date: 0	0108110, 06/14/10
				TAN	NK	0120110911120110
			V	S.P.D.		ficible: Y/ N / NA
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXC.	VATION DEPRESSION; B.G. = BELOV	V GRADE; B = BELOW; T.H. = T		3.F.D.		/isible: Y / N / NA
T.B. = TANK BOTTOM; PBGTL = PREVIOUS NA - NOT APPLICABLE OR NOT AVAILABL	BELOW-GRADE TANK LOCATION; S	PD = SAMPLE POINT DESIGN	IATION; R.W. = RETAL	INING WALL; M	agnetic declination	on: 10° E
TRAVEL NOTES: CALLOUT:	03/16/11	ONSITE	00117111	03/18/11 (S	ched.)	

revised: 01/26/11 BEI1005E-3.SKF

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Apr-11

CLIENT:

Blagg Engineering

Lab Order:

1103859

Project:

Florance O #20

Lab ID:

1103859-01

Client Sample ID: 5PC-TB@6' (21 BGT)

Collection Date: 3/17/2011 3:15:00 PM

Date Received: 3/22/2011

Matrix: SOIL

Analyses	Result	PQL	Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	E ORGANICS				Analyst: SCC
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	3/28/2011 2:41:34 AM
Surr: DNOP	94.9	81.8-129	%REC	1	3/28/2011 2:41:34 AM
EPA METHOD 8015B: GASOLINE RA	NGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	3/25/2011 4:29:12 PM
Surr: BFB	103	89.7-125	%REC	1	3/25/2011 4:29:12 PM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.050	mg/Kg	1	3/25/2011 4:29:12 PM
Toluene	ND	0.050	mg/Kg	1	3/25/2011 4:29:12 PM
Ethylbenzene	ND	0.050	mg/Kg	1	3/25/2011 4:29:12 PM
Xylenes, Total	ND	0.050	mg/Kg	1	3/25/2011 4:29:12 PM
Surr: 4-Bromofluorobenzene	115	85.3-139	%REC	1	3/25/2011 4:29:12 PM
EPA METHOD 300.0: ANIONS					Analyst: SRM
Chloride	ND	7.5	mg/Kg	5	3/31/2011 12:47:49 AM
EPA METHOD 418.1: TPH					Analyst: JB
Petroleum Hydrocarbons, TR	30	20	mg/Kg	1	3/30/2011

Qualifiers:

- Value exceeds Maximum Contaminant Level
- Estimated value
- Analyte detected below quantitation limits
- NC Non-Chlorinated
- POL Practical Quantitation Limit

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

				y Record	Turn-Around	Time:			200				I A I			AT %	TE	•		4=	RIT	- 4 1	ı
Client:	AGG .	ENGR.	1 BP	America	Standard			_												1E			
			1		Project Name	:			4									al.co					
Mailing A	Address:	P.O.	BOX	87	FLORA	NGE O	720			490	01 H							e, NI		109			
				87413	Project #:						l. 50						-	345-					
Phone #	. (.	765)	163	2-1199							550 TO 15	-		STATE OF TAXABLE		20 (100)	STATE OF THE PARTY.	uest	10000		Ba		
email or	The state of the s	, 0,0	000		Project Mana	ger:	4	926	- 00	<u>S</u>	(e)					No. of Concession,							w
QA/QC P	ackage:		□ Lev	el 4 (Full Validation)	-	or VELE	2		8 (80218	Gas only)	(Gas/Diesel)					PO4,SO	PCB's			(0.0)		1	SAME
Accredit				(Sampler: A	ELJON	VELEZ		1	PH (_			02,1	/ 8082			300		4	里_
□ NEL	AP	□ Othe	Γ		On Ice	15/26S	LING		F	1	15B	418.1)	04.1	AH)3,N	/ 8		8	V		9	N Z
□ EDD	(Type)_					peraturo 4 p			#	BE	1801	9 4	d 5	or P	tals	N,	ides	2	0	8		SAMPLE	Composite es (Y or N)
Date	Time	Matrix	Sar	mple Request ID	Container Type and #	Preservative Type	EEAEMO 110-28-59 =		BTEX +-MTB	BTEX + MTBE	TPH Method	TPH (Method	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,SO4)	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	CHLORIOE		GRANB S	5 Poust Compositi
3/17/11	1215	SOIL	5P5-	-TBe6' (ZIBST)	402 -	COOL	1		V		V	V								√			1
717,117																							
3/_/	4015			TB = 7.5' (15 84)	11		2		1		1	./								1			
110111	حاذم	SOIL	SPC	105 110 (1) 841)	102.	COOL			-		V	V											7
3/_/				7/\			7		Η,		_		-			-				2	-		
118/11	0975	501L	62-	3051 (12841)	402.	COUL	3		V		4									7		7	
						-			<u> </u>	_							_						
**																							
				- 244					1						\vdash								
									+-		_					\vdash			-				
Date: 3/2///	Time: 1505	Relinquis	la	VZ	Received by:	- Walte	Date Time 3/21/11/50	5	Rei	J mark	u									333 5L			
Date: 3/21/11	Time:	Relinquish	stere	- Wallen	Received by:	1-82	3/20/j(16)				(8	OIS	5).	_ (SRI	٥ ,	+ D	RC)	orti	24		,
1	f necessary	, samples sub	mitted to I	Hall Environmental may be sub-	contracted to other a	accredited laboratoric	es. This serves as notice	of thi	s poss	ibility.	Any s	ub-co	ntracte	ed data	will b	e clea	rly not	ated o	n the a	analytic	≥l rep	ort.	

Date: 05-Apr-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project: Florance O #20

Work Order:

1103859

Project: Florance O	#20								Work	Order:	1103859
Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec L	.owLimit Hi	ighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: A	nions						,		9		
Sample ID: MB-26158		MBLK				Batch ID:	26158	Analys	is Date:	3/29/2011	6:19:38 P
Chloride	ND	mg/Kg	1.5			1					
Sample ID: LCS-26158		LCS				Batch ID:	26158	Analys	is Date:	3/29/2011	6:37:02 P
Chloride	13.98	mg/Kg	1.5	15	0	93.2	90	110			
Method: EPA Method 418.1: T	PH										
Sample ID: MB-26157		MBLK				Batch ID:	26157	Analys	is Date:		3/30/201
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: MB-26236		MBLK				Batch ID:	26236	Analys	is Date:		4/5/201
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-26157		LCS				Batch ID:	26157	Analys	is Date:		3/30/201
Petroleum Hydrocarbons, TR	96.88	mg/Kg	20	100	0	96.9	81.4	118			
Sample ID: LCS-26236	00.00	LCS	20	100	O	Batch ID:	26236		is Date:		4/5/201
Petroleum Hydrocarbons, TR	104.7	mg/Kg	20	100	0	105	81.4	118			
Sample ID: LCSD-26157	104.7	LCSD	20	100	U	Batch ID:	28157		is Date:		3/30/201
Petroleum Hydrocarbons, TR	95.50	mg/Kg	20	100	0	95.5	81.4	118	1.43	8.58	0,00,201
Sample ID: LCSD-26236	95.50	LCSD	20	100	U	Batch ID:	26236		is Date:	0.30	4/5/201
	102.2		20	100	0			100 50000		0.50	4/3/201
Petroleum Hydrocarbons, TR	103.3	mg/Kg	20	100	0	103	81.4	118	1.33	8.58	
Method: EPA Method 8015B: D	Diesel Range	_									
Sample ID: MB-26098		MBLK				Batch ID:	26098	Analysi	is Date:	3/25/2011	9:44:45 Al
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-26098		LCS				Batch ID:	2609 8	Analysi	is Date:	3/25/2011 1	0:19:07 Al
Diesel Range Organics (DRO)	49.83	mg/Kg	10	50	0	99.7	66.2	120			
Sample ID: LCSD-26098		LCSD				Batch ID:	26098	Analysi	is Date:	3/25/2011 10	0:53:14 AM
Diesel Range Organics (DRO)	51.17	mg/Kg	10	50	0	102	66.2	120	2.66	14.3	
Method: EPA Method 6015B: G	asoline Ran	qe									
Sample ID: MBLK-26105		MBLK				Batch ID:	26105	Analysi	s Date:	3/25/2011	7:59:47 PN
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-26105		LCS				Batch ID:	26105	Analysi	is Date:	3/25/2011	6:59:35 PI
Gasoline Range Organics (GRO)	25.02	mg/Kg	5.0	25	0	100	88.8	124			
-											
Method: EPA Method 6021B: V	olatiles	MOLK				Patch ID:	26405	Analysi	a Data:	2/25/2011	7.E0.47 DI
Sample ID: MBLK-26105	NID	MBLK				Batch ID:	26105	Analysi	s Date.	3/25/2011	7.09.47
Benzene	ND	mg/Kg	0.050							8	
Thylhanzone	ND ND	mg/Kg mg/Kg	0.050								
	ND		0.00								
	ND	ma/Ka									
(ylenes, Total	ND	mg/Kg LCS	0.10			Batch ID:	26105	Analysi	s Date:	3/25/2011	7:29:38 PN
(ylenes, Total Sample ID: LCS-26105		LCS		1 (0.0171	Batch ID:	26105 83.3	Analysi	s Date:	3/25/2011	7:29:38 Pr
Kylenes, Total Sample ID: LCS-26105 Senzene	1.057	LCS mg/Kg	0.050		0,0171	104	83.3	107	s Date:	3/25/2011	7:29:38 Pf
Ethylbenzene Xylenes, Total Sample ID: LCS-26105 Benzene Toluene Ethylbenzene		LCS		1	0,0171 0 0,0055				s Date:	3/25/2011	7:29:38 PN

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

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG			Date Received	:	3/22/2011	
Work Order Number 1103859			Received by:	KMS	h 0	
Checklist completed by: Signature	7	3/2; Date	Sample ID lal	pels checked	by: Initials	
Matrix:	Carrier name: Gre	yhound				
Shipping container/cooler in good condition?	Yes	>	No 🗆	Not Present		
Custody seals intact on shipping container/cooler?	Yes	3	No 🗌	Not Present	☐ Not Shipped	
Custody seals intact on sample bottles?	Yes	3 	No 🗌	N/A	✓	
Chain of custody present?	Yes		No 🗌			
Chain of custody signed when relinquished and rece	ived? Yes	V	No 🗌			
Chain of custody agrees with sample labels?	Yes		No 🗆			
Samples in proper container/bottle?	Yes	V	No 🗌			
Sample containers intact?	Yes	V	No 🗌			
Sufficient sample volume for indicated test?	Yes	✓	No 🗆			
All samples received within holding time?	Yes	✓	No 🗌		Number of bottles che	
Water - VOA vials have zero headspace?	o VOA vials submitted	✓	Yes	No 🗌	pH;	ocked for
Water - Preservation labels on bottle and cap match	? Yes		No 🗆	N/A 🗸		
Water - pH acceptable upon receipt?	Yes		No 🗌	N/A 🗹	<2 >12 unle	ess noted
Container/Temp Blank temperature?	4		6° C Acceptable		DOTOW.	
COMMENTS:		lf	given sufficient t	me to cool.		
					•	
Client contacted Date	contacted:		Persor	contacted		
Contacted by: Reg	arding:					
Comments:						
Corrective Action						****



