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.

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

Santa Fe, NM 87505

12997 Proposed Alternative Method Permit or Closure Plan Applica	ation
Type of action: Below grade tank registration	OIL CONS. DIV DIST. 3
Permit of a pit or proposed alternative method	
46-29029	JUL 07 2015
Modification to an existing permit/or registration	ale halass anada tanla
Closure plan only submitted for an existing permitted or non-permitted proposed alternative method	oit, below-grade tank,
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alto	ernative reauest
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surfa	•
environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authori	
1.	
Operator: BP America Production Company OGRID #:778	
Address:200 Energy Court, Farmington, NM 87401	
Facility or well name:Brown Federal J 1	
API Number:3004529029 OCD Permit Number:4591	
U/L or Qtr/QtrMSection13Township32NRange11WCounty:San	n Juan
Center of Proposed Design: Latitude36.98143 Longitude107.94820	NAD: □1927 ⊠ 1983
Surface Owner: X Federal X State Private Tribal Trust or Indian Allotment	
☐ 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 Drilli ☐ Lined ☐ Unlined Liner type: Thickness mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other ☐ String-Reinforced	
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L_	x Wx D
3.	
Volume:21.0bbl Type of fluid:Produced water	
Tank Construction material:Steel	
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other _Single walled/double bottomed; side wall	s not visible
Liner type: Thickness mil HDPE PVC Other	
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.

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school institution or church)	, hospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
6.	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other Mattheward for (16 author and a size the facility)	
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. 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 accematerial 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
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
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	Yes No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached.	
Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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:	

12.	
' <u>Permanent Pits Permit Application Checklist</u> : 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 F Alternative	luid Management Pit
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	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
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. F 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	
Three confirmation of vertication from the maintenparity, written approval obtained from the maintenparity	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
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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. 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	.11 NMAC .15.17.11 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 bel	ief.
Nama (Print):	
Name (Print): Title:	
Name (Print): Title:	
Signature:	
Signature: Date:	
Signature:	
Signature: Date:	the closure report.
Signature:	the closure report.
Signature:	the closure report.

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 requirements.	
benefit. Taiso certify that the closure compiles with an applicable closure requireme	ents and conditions specified in the approved closure plan.
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Off Peace	Date:July 7, 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

Brown Federal J 1 – Tank B (21 bbl) API No. 3004529029 Unit Letter M, Section 13, T32N, R11W

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

General Closure Plan

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

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

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

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

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

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method	Release Verification	Sample
	Tank B - 21 bbl	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	0.011
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.97
TPH	US EPA Method SW-846 418.1	100	13.6
Chlorides	US EPA Method 300.0 or 4500B	250 or background	170

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

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

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

Sampling results indicate 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 has been reclaimed since it is not within the active area.

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

The area over the BGT is not within the active well area and has been reclaimed.

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 not within the active well area and has been reclaimed.

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 not within the active well area and has been reclaimed.

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 has seeded the area since it is not within the active well area.

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.

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

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

			Rele	ease Notific	catio	n and Co	rrective A	ction				
						OPERA	ГOR	[Initia	al Report	\boxtimes	Final Report
Name of Co						Contact: Jef						
		Court, Farmi	ngton, N	M 87401			No.: 505-326-94					
Facility Nat	ne: Browi	Federal J I				Facility Typ	e: Natural gas v	well				
Surface Ow	ner: Feder	al	.,	Mineral (Owner:	Federal			API No	. 30045290)29	
				LOCA	ATIO	N OF REI	LEASE					
Unit Letter M	Section 13	Township 32N	Range 11W	Feet from the 1,255		South Line	Feet from the 670	East/W West	est Line	County: Sa	an Juan	
		Lat	itude3	36.98143		Longitud	e107.94820_					
				NAT	URE	OF RELI	EASE					
Type of Rele							Release: N/A			Recovered: N		
		v grade tank –	21 bbl				our of Occurrence	e:	Date and	Hour of Disc	covery:	
Was Immedia	ate Notice (Yes [No 🛛 Not R	equired	If YES, To	Whom?					•
By Whom?		,				Date and H						
Was a Water	course Read		Yes 🛚	No		If YES, Vo	lume Impacting t	the Water	course.			
If a Watercon	irse was Im	pacted, Descri	be Fully.*	•		,,						·
		r,										
Describe Con	£D1-1	and D		. T.l * C1	641	11 1	4- DCT 1				*1 *	1 - C
							the BGT was done results are attach		removaii	to ensure no	son im	pacts from
501. 50	anary oro .		., 0 . 2	and emoride sero	,, starrat	rao. Tinaryon	rosans are anaor	ica.				ļ
Describe Are	a Affected	and Cleanup A	ction Tak	en * RGT was re	moved s	and the area u	nderneath the BG	T was sat	nnled Ti	ne area unde	r the R(GT was
				d since it is not w				i was sai	npicu. Ti	ie area unue	i ilie De	JI was
	•							•				
L hereby certi	fy that the i	nformation gi	ven ahove	is true and comp	lete to th	ne hest of my	knowledge and u	nderstand	that purs	uant to NM(OCD ru	les and
							id perform correc					
							arked as "Final Re					
							on that pose a three the operator of r					
		vs and/or regu		tance of a C-141	report d	des not renev	e me operator or i	esponsio	inty for co	этрпансе w	itii aiiy	outei
		Λ		- <u>-</u>			OIL CONS	SERVA	TION	DIVISIO	N	
Signature:	000 L	1000	_									
Signature.	XTV					Annroyad by	Environmental S _I	nagialist				
Printed Name	: Jeff Peace	e				Approved by	Environmentar sp	pecialist.				
Title: Field E	nvironment	al Coordinato	r			Approval Dat	e:	Ех	piration l	Date:		
E-mail Addre	ss: peace.je	ffrey@bp.con	n			Conditions of	Approval:			Attached		
Date: July 7,	2015	P	none: 505-	-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API#: 3004529029
FIELD REPORT:	BGT CONFIRMATION TEMP. PIT CLOSURE / RELEASE INVESTIGATION (other)	PAGE No:1 of1_
SITE INFORMATION QUAD/UNIT: M SEC: 13 TW QTR-QTR/FOOTAGE: 1,255'S/6 LEASE #: SF078039 REFERENCE POINT 1) -45 BGT (SW/DB) 2) 21 BGT (SW/DB) 3)	SITE NAME: BROWN FEDERAL J # 1 P: 32N RNG: 11W PM: NM CNTY: SJ ST: NM 70'W SW/SW LEASE TYPE: FEDERAL STATE / FEE / INDIAN PROD. FORMATION: MV CONTRACTOR: ELKHORN WELL HEAD (W.H.) GPS COORD.: 36.98131 X 107. GPS COORD.: 36.98143 X 107.94820 DISTANG GPS COORD.: DI	DATE STARTED: 04/13/10 DATE FINISHED: ENVIRONMENTAL SPECIALIST: JCB 94786 GL ELEV:: 6,223' CE/BEARING FROM WH.: 153', 356W- CE/BEARING FROM WH.: OVM READING 18.1/8015/8021/4500B (CI) NA
COHESION (ALL OTHERS): NON COHESIVE SLIGHT CONSISTENCY (NON COHESIVE SOILS): L PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC DENSITY (COHESIVE CLAYS & SILTS): SOF MOISTURE: DRY SLIGHTLY MOIST MOIST / N ADDITIONAL COMMENTS:	DISCOLORATION/STAINING OBSE AMPLE OOLLEGTED FROM 45 ONL OOSE FIRM / DENSE / VERY DENSE / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC T / FIRM / STIFF / VERY STIFF / HARD VET / SATURATED / SUPER SATURATED DISCOLORATION/STAINING OBSE OMMPLE OOLLEGTED FROM 45 ONL OOLLEGTED FROM 45 ONL SAMPLE TYPE: GRAB COMPOSITE	EXPLANATION - SAMPLE # OF PTS
SITE SKETCH B FENCE	PBGTL T.B. ~ 6' B.G. PWELL HEAD	PLOT PLAN circle: Attached MISCELL. NOTES WO: N575727 PO: ZANDECALSL SW - SINGLE WALLED DB - DOUBLE BOTTOM 45 BCT - SIDEWALLS NOT VISIBLE
	X - $S.P.D.$ VATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW, T.H. = TEST HOLE; \sim = APPROX; BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; RW = RETAINING WALL. ONSITE: $04/13/10$	MAGNETIC DECLINATION @ 10° E



EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	21 BGT 5-pt @ 6'	Date Reported:	04-19-10
Laboratory Number:	53701	Date Sampled:	04-13-10
Chain of Custody No:	9094	Date Received:	04-15-10
Sample Malnix;	Soil	Date Extracted:	04-19-10
Preservative:	::Cool	Date Analyzed:	04-19-10
Condition:	Intact	Analysis Needed:	TPH-418:1

	1.	,	Det.
	3 (\$	Concentration	Limit,
Parameter	in and the second of the secon	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

13.6

9.9

ND = Parameter not detected at the stated detection limit:

References:

Method 418:1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978,

Comments:

Brown J Fed #1

Analyst

Review Cotto



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

	Special Europe		
Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	21 BGT 5PT @6'	Date Reported:	04-19-10
Laboratory Number:	53701	Date Sampled:	04-13-10
Chain of Custody No:	9094	Date Received:	04-15-10
Sample Matrix:	Soil *	Date Extracted:	04-15-10
Preservative:	Cool	Date Analyzed:	04-16-10
Condition:	Intact	Analysis Requested:	8015 TPH

Parametér	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	3.2	0.2
Diesel Range: (C10 - C28)	2. 1	0.1
Total Petroleum Hydrocarbons	5.3	0.2

ND - Parameter not detected at the stated detection limit.

References

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USERA, December 1996.

Comments:

Brown J Fed #1

Analyst



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

		,	
Client	Blagg/BP	Project#	94034-0010
Sample ID:	21 BGT 5PT @6'	Date Reported:	04-19-10
Laboratory Number:	53701	Date Sampled:	04-13-10
Chain of Custody:	9094	Date Received:	04-15-10
Sample Matrix:	Şoji.	Date Analyzed:	04-16-10
Preservative:	Cool	Date Extracted:	04-15-10
Condition:	Intact	Analysis Requested	BTEX.

Parameter	Concentration (ug/Kg)	Det. Limit (üg/Kg)	
Benzene	11.0	0.9	
Toluene	• •	1.0	
Ethylbenzene	20.7 28.2	1.0	
p,m-Xylene	539	1.2	
o-Xylene	371	0.9	
Total BTEX	970		

ND · Parameter not detected at the stated detection limits

Surrogate Recoveries:	Rarameter	Percent Recovery
	Fluorobenzene	88.8 %
	1,4-difluorobenzene	89.3.%
	Bromochlorobenzene	107 %

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating/Solid Waster SW-846, USEPA,

December 1996.

Method 8021B. Aromatic Volatile Organics. Test Methods for Evaluating Solid Waste, SW-846.

USEPA December 1996.

Comments:

Brown J Fed #1

Analyst

Mother of weller



Chloride

Blagg/BP Client: Project #: 94034-0010 Sample:ID: 21 BGT 5-pt @ 6 Date:Reported: 04-16-10 Lab ID#: 53701 Date Sampled: 04-13-10. Sample Matrix: Soil Date Received: 04-15-10 Preservative: Cool Date Analyzed: 04-16-10 Condition: Intact Chain of Gustody: 9094

Parameter

Concentration (mg/Kg)

Total Chloride

170

Reference:

U.S.E.P.A., 4500B; "Methods for Chemical Analysis of Water and Wastes", 1983.

Standard Methods For The Examination of Water And Waste Water": 18th ed., 1992.

Comments:

Brown J Fed #1

Analyst.



EPA METHOD 418.1 TOTAL PETROLEUM **HYROCARBONS** QUALITY ASSURANCE REPORT

Client:

QA/QC

Project #:

N/À

Sample ID:

QA/QC

Date Reported

04-19-10

Laboratory Number:

04-19-TPH.QA/QC-53699

Date Sampled:

N/A

Sample Matrix::

Freon-113

Date Analyzed:

04-19-10 04-19-10

Preservative: Condition:

N/A NA. Date Extracted: Analysis Needed:

TPH

Calibration, Lea Date

. C-Cal Date∗

C-Cal RF: % Difference

Accept Range

04-05-10

04-19-10

1,540

1,530

+/- 10% 0.7%

Blank Conc. (mg/Kg)

TPH

:Concentration ND

9.9

Duplicate Conc. (mg/Kg)

Duplicate

% Difference - Accept Range

TPH

Sample 3 14.8

12.3

16.9%

+/- 30%

Spike Conc. (mg/Kg) **TPH**

14.8

Spike Added Spike Result. 2.000

1,760

Recovery Accept Range 87.4%

80 - 120%

ND = Parameter not detected at the stated detection limit

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978

Comments:

QA/QC for Samples 53699 - 53701, 53713 - 53744, 53719, 53726 - 53727; and 53729 - 53730.

Analyst



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

	*.		•		
Client:	QA/QC		Project #:		N/A
Sample ID:	04-16-10 QA/0	QÇ	Date Reported:		04-19-10
Laboratory Number:	53694		Date:Sampled:		N/Å
Sample Matrix:	Methylene Ghlor	ride	Date Received:		N/Ã
Preservative:	N/A	*•	Date Analyzed:		04-16-10
Gondition:	Ņ/A		Analysis Reques	TPH	
	www.ircaloate	is iscaling	G _P CaliRF %	% Difference	*Accept Range
Gasoline Range C5 - C10	05-07-07	9.1693E+002	9.1729E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.4974E+002	9,5012E+002	0.04%	0 - 15%
Blank Conc. (mg/L/5mg/Kg)		Gorgentration		Detection Lin	
Gasoline Range C5 - C10	S. M. T. W. C. S.	ND	ASSET ANDRES DE CITAL DE MINISTER DE CANADANIA	0.2	Mighail •
Diesel Range C10 - C28	.,	ND		0.1	
Total Petroleum Hydrocarbons		ND		0.2	
Duplicate Cone: (mg/kg)	∛"∛Sample ∞	Cuplicate	% Difference	Noceal Hand	
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%	
Diesel Range C10 - C28	102	101	99.3%	0 - 30%	
Spike Conc. (mg/Kg):	Sample	Spike Added	∤Spike Result	Va Recoverv	Accept Range
Gasoline Range C5 - C10	ND	250	234	93.6%	75 - 125%
Diesel Range C10 - C28	102	250	398	113%	75 - 125%
	11141	. " »	* .		T & 11 4 4

ND - Parameter not detected at the stated detection limit.

Réferences:

Méthod 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 53649 and 53694 - 53702

Arjalyst

Review



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	·N/Á		Project #:		N/A 04-19-10				
Sample ID:	04-16-BT CAVOC		Date Reported:						
Laboratory Number	53694		Date Sampled:		≩N/Á,				
Sample Matrix:	Şoil		Date Received:		N/A				
Preservative:	N/A		Date Analyzed:		04-16-10				
Condition	N/A·		Analysis:		BTEX				
Detection Limits (ug/L) Benzene	1/3001E+006	All Carrier and Ca	ikke <u>n vonigen gebra hakeall</u> k entellikal zatet zatet	a managana ay marang ay 100 maga	Emit	10.36			
Toluene		1.3027E+006	0.2%	ND"	0.1				
	1.1992E+006	1.2016E+006	0.2%	ND.	0.1				
Ethylbenzene	1.0669E+006	1.0691E+006	0.2%	ND	√0.1				
p,m-Xylene	2.6437E+006	2.6490E+006	0.2%	ND	0.1				
o-Xylene	 1.007₁E+006. 	1.0091E+006	0.2%	ND.	0.1				

Duplicate Conc. (Up/Kg)	Service Services	mples of the D	Johnale :	%COM	Accept Range	S Delect Linits
Benzene		ND	ND.	0.0%	0 - 30%	0.9
Toluene		ND	ND	0.0%	0 -30%	1:0
Ethylbenzene		ND	ND	0.0%	0 - 30%	1.0
p.m-Xylene.	:	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	Š.	ŅD	ND	0.0%	0 - 30%	0.9

Spike Conc. (ing/Kg)	2.4.2	imple: Ami	ino Soikeo Soil	red Samole	% Recovery	Accept Range
Benzene	5	ND	50.0	49.6	99.2%	39 - 150
Toluene	* -	ND	50.0	49.4	98.7%	46 - 148
Ethylbenzene	12	NĐ	50.0	48.3	96.6%	32 - 160
p,m-Xylene		ND	100	94.8	94.8%	46 - 148
o-Xylene	٠ پ	ND	50.0	48.3	96.6%	46 - 148

ND - Parameter not detected at the stated detection limit.

References:

Method 5030B, Purge; and Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996:

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photolonization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments:

QA/QC for Samples 53649 and 53694 - 53701

Analyst

CHAIN OF CUSTODY RECORD

Client: Project Name / Location:							<i>!</i>	······································				ΔΝΑΙ	VŠIS	/ PAR	AME	TERS				···			
BLALL /BP	BLAGE BP BROWN J FED #1								ļ. ,					/ THALLE		, is in	/ (IV) C						,
Olient Address:		9	lampler Name:						30.15)	8021)	3260)	10											
Client Phone No.:		C	J- Bu Sent No.: 94034	-001					TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA.8 Metals	Cation / Anion		TCLP with H/P		TPH (418.1):	RIDE	ļ			Sample Cool	Sample Intact
Sample No./ Identification	Sample Date	Sample Time	Lạ b Nó.	1	ample Jatrix	No./Volume of Containers			TPH (I	BTEX	VOC (RCRA	Cation	RCI	TCLP	PAH	TPH (CHLORIDE				Samp	Samp
5 pt 26	M	1450	53700	Solid	Sludge Aquaous	1 402			<i>5</i> <	بحد							5<	٠				y	U
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ZI BGT 5-pe06	bs.	1500	53701	Soil) Solid	Sludge: Aqueous	.u(j			×	R							×	مغر		:		4	_4
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				Soil Solid	Sludge Aqueous																· .		
				Solid Solid	Sludge Aqueous								*		į					· .,			
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