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-Grad	e Tank, or
-----------------	------------

Santa Fe, NM 87505

13034	Proposed Alternative Meth	nod Permit or Closure Plan Appl	
Type	of action: Below grade tank regist	ration	OIL CONS. DIV DIST. 3
	Permit of a pit or propos	sed alternative method	
45-223	Closure of a pit, below-	grade tank, or proposed alternative method	JUL 15 2015
	☐ Modification to an exist☐ Closure plan only subm	itted for an existing permitted or non-permitted	ed pit, below-grade tank,
or pro	posed alternative method	F	F,
Instruc	tions: Please submit one application (For	rm C-144) per individual pit, below-grade tank or	alternative request
		r of liability should operations result in pollution of s	
1.	oval relieve the operator of its responsibility to	o comply with any other applicable governmental aut	hority's rules, regulations or ordinances.
	Production Company	OGRID #:778	
API Number:30045	22361	OCD Permit Number:4604	
Center of Proposed Desig	n: Latitude36.73431	Longitude107.63892	NAD: □1927 ⊠ 1983
Surface Owner: X Feder	al 🗌 State 🗌 Private 🗎 Tribal Trust or In	dian Allotment	
2.	V-000	itoral C-141 Rea Relea	Louritas) se
<u>Pit</u> : Subsection F, G	or J of 19.15.17.11 NMAC + Had	TONG CITY TOO	19.15 29NMAG
Temperary.			
		Ell Fluid Management Low Chloride D	
	iner type: Thicknessmil	LLDPE HDPE PVC Other	
String-Reinforced			
Liner Seams: Welded	Factory Other	Volume:bbl Dimensions:	Lx Wx D
3.			
Below-grade tank:	Subsection I of 19.15.17.11 NMAC	Tank A	
Volume:21.0	bbl Type of fluid:Pro	duced water	
Tank Construction materi	al: _Steel		
☐ Secondary containme	nt with leak detection Visible sidewall	ls, liner, 6-inch lift and automatic overflow shut-of	f
☐ Visible sidewalls and	liner	r _Single walled/double bottomed	
Liner type: Thickness	mil	VC Other	
4.			
Alternative Method:			
Submittal of an exception	request is required. Exceptions must be su	abmitted to the Santa Fe Environmental Bureau of	fice for consideration of approval.

Form C-144

<u> </u>	
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,
Attended. Trease specify	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other Monthly inspections (If netting or screening is not physically feasible)	
7	
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC	
Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
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
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 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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natructions: 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 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. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 15.17.9 NMAC
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC	
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Previously Approved Design (attach copy of design) API Number: or Permit Number:	
OF Fernite Number: OF Fernite Number: OF Fernite 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 attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	documents are			
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	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 Site Reclamation 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. In 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			
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells				
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site				
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ 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.	Yes No
- 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 19.15.17.11 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.1 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 cannon 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	1 NMAC 5.17.11 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 belie	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address: Telephone:	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: OCD Permit Number:	15
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 a The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not a section of the form until an approved closure plan has been obtained and the closure activities have been completed.	
☐ Closure Completion Date:3/12/2010	
^{20,} Closure Method: ☑ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loc ☐ 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 indicated 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	licate, by a check

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 requirements.	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Jeff Ponce	Date:July 9, 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

Vandewart A 1A API No. 3004522361 Unit Letter P, Section 11, T29N, R8W

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 sent due to misunderstanding of BGT notice requirements at the 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 sent due to misunderstanding of BGT notice requirements at the time.
- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)

- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

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

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

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

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method	Release Verification	Sample
	21 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	5.290
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	80.9
TPH	US EPA Method SW-846 418.1	100	4,030
Chlorides	US EPA Method 300.0 or 4500B	250 or background	4

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 chloride levels were below the stated limits. TPH was 4,030 ppm by Method 418.1 and was 3,330 ppm by Method 8015B. Benzene was 5.29 and BTEX was 80.9 ppm by Method 8021. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
 - Sampling results indicate a release occurred. The release will be addressed through the spill and release guidelines.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

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

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

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

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

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

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

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

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

BP will seed the area when the well is plugged and abandoned 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.

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

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.

1220 S. St. Francis Dr., Santa Fe, NM 87505 Santa Fe, NM 87505 Release Notification and Corrective Action OPERATOR Initial Report Final Report Name of Company: BP Contact: Jeff Peace Address: 200 Energy Court, Farmington, NM 87401 Telephone No.: 505-326-9479 Facility Name: Vandewart A 1A Facility Type: Natural gas well Mineral Owner: Federal Surface Owner: Federal API No. 3004522361 LOCATION OF RELEASE Township North/South Line Feet from the East/West Line Unit Letter Section Range Feet from the County: San Juan 29N 8W 800 800 P 11 South East **Latitude** 36.73431 Longitude 107.63892 NATURE OF RELEASE Type of Release: condensate/oil Volume of Release: unknown Volume Recovered: none Source of Release: below grade tank - 21 bbl Date and Hour of Occurrence: Date and Hour of Discovery: March 9, 2010; 12:00 PM unknown Was Immediate Notice Given? If YES, To Whom? ☐ Yes ☐ Not Required By Whom? Date and Hour Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. ☐ Yes ☒ No If a Watercourse was Impacted, Describe Fully.* Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in chloride below standards. TPH was 4,030 ppm by Method 418.1 and was 3,330 ppm by Method 8015B. Benzene was 5.29 ppm and BTEX was 80.9 ppm by Method 8021. Analysis results are attached. Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. Sampling results indicate a release occurred. The release will be addressed through the spill and release guidelines. The area under the BGT was backfilled and compacted and is still within the active well area. I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. OIL CONSERVATION DIVISION Signature: Approved by Environmental Specialist: Printed Name: Jeff Peace Expiration Date: Title: Field Environmental Coordinator Approval Date: E-mail Address: peace.jeffrey@bp.com Conditions of Approval: Attached

Date: July 9, 2015

Phone: 505-326-9479

^{*} Attach Additional Sheets If Necessary

•	BP		G ENGINE				2004522264
CLIENT:		P.O. BOX 87, BLOOMFIELD, NM 87413			API#: 3004522361		
		(;	505) 632-1	133			
FIELD RE	PORT:	BGT CONFIRMATION (other)	TEMP. PIT CLOSU	JRE / RELEASE I	INVESTIGATION		PAGE No:1 of1
	DRMATION		VANDEWAF				DATE STARTED: 03/09/10
QUAD/UNIT: P		P: 29N RNG: 8V					DATE FINISHED:
		00'E SE/SE	_			INDIAN	ENVIRONMENTAL
		PROD. FORMATION:					SPECIALIST: JCB
							905 GLELEV.: 6,396'
1) 21 BGT	(SW/DB)	GPS COORD.:	36.7343	1 X 107.638	392	DISTANCE/BE	EARING FROM W.H.: 60', \$35E
2)		GPS COORD.:				DISTANCE/BE	EARING FROM W.H.:
3)		GPS COORD.:				DISTANCE/BE	EARING FROM W.H.:
4)						DISTANCE/BE	EARING FROM W.H.:
5)		GPS COORD.:					EARING FROM W.H.:
	RMATION:	CHAIN OF C	USTODY RECOR				
1) SAMPLE ID:	21 BGT 5 pt. @	7' SAMPLE DATE:	03/09/10	_ SAMPLETIME:	1200	LAB ANALYSIS:	418.1/8015B/8021B/300.0 (CI)
2) SAMPLE ID:		SAMPLE DATE:		_ SAMPLETIME:		LAB ANALYSIS:	
3) SAMPLE ID:		SAMPLE DATE:	-	_ SAMPLETIME:		LAB ANALYSIS:	
4) SAMPLE ID:		SAMPLE DATE:					
5) SAMPLE ID:		SAMPLE DATE:		_ SAMPLETIME:		LAB ANALYSIS:	
SOIL COLOR: COHESION (ALL OTHERS): CONSISTENCY (NON PLASTICITY (CLAYS): NON PL DENSITY (COHESIVE (MOST NON COHESIVE / SLIGHTL' COHESIVE SOILS): LC LASTIC / SLIGHTLY PLASTIC [CLAYS & SILTS): SOFT HTLY MOIST / WOIST / W	SOIL TYPE: S, LY DARK BROWN COHESIVE / COHESIVE / HIGH COSE / FIRM / DENSE / VE COHESIVE MEDIUM PLASTIC / HIGH FIRM STIFF / VERY STI ET / SATURATED / SUPER S	HLY COHESIVE ERY DENSE GHLY PLASTIC	DISCOLORA LIGHT GRA	TION/STAINING Y ETECTED: YE	G OBSERVE	D: YES / NO EXPLANATION - LANATION - MINOR # OF PTS
							*
	NSIONS (if applicable): NA ft.	XNA ft.	X NA	ft.	cubic yards e	xcavated (if applicable): NA
SITE SKET	CH					A	PLOT PLAN
						N	circle: Attached
		WELL +					MISCELL. NOTES
		HEAD ♥					SW - SINGLE WALLED DB - DOUBLE BOTTOM SIDEWALLS VISIBLE
		FENCE				-	
						1-	
		BERM	$\sqrt{(x \overset{\circ}{x} \overset{\circ}{x})}$	PBGTL T.B. ~ 6'		-	
				B.G.		-	
					V .		
NOTES. DOT- DE CHI	ODADE TANK ED. EVO	WITION DEDDESCRIPTION	- DEL ON/ODARE D	DEL CIALTIL - TEC		S.P.D.	
The second secon		AVATION DEPRESSION; B.G.: S BELOW-GRADE TANK LOC					MAGNETIC DECLINATION @ 10° E
TRAVEL NOTES:	CALLOUT			ONSITE:	03/09/10		



EPA METHOD 418.1 TOTAL PETROLEUM **HYDROCARBONS**

Client	Blagg/BP	Project #:	94034-0010
Sample ID:	21 BGT 5-pt @ -7'	Date Reported:	03-12-10
Laboratory Number:	53319	Date Sampled:	03-09-10
Chain of Custody No:	8840	Date Received.	03-10-10
Sample Matrix:	Soil	Date Extracted:	03-12-10
Preservative:	Cool	Date Analyzed:	03-12-10
Condition:	Intact	Analysis Needed	TPH-418 1

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

4,030

121

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:

Vandewart A #1A

Mostly of Weeters Review



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	21 BGT 5-pt @ -7'	Date Reported:	03-11-10
Laboratory Number:	53319	Date Sampled:	03-09-10
Chain of Custody No:	8840	Date Received:	03-10-10
Sample Matrix:	Soil	Date Extracted:	03-10-10
Preservative:	Cool	Date Analyzed:	03-11-10
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	3,290	0.2
Diesel Range (C10 - C28)	38.4	0.1
Total Petroleum Hydrocarbons	3,330	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, USEPA, December 1996.

Comments:

Vandewart A #1A

Analyst



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	21 BGT 5-pt @ -7'	Date Reported:	03-11-10
Laboratory Number:	53319	Date Sampled	03-09-10
Chain of Custody:	8840	Date Received:	03-10-10
Sample Matrix:	Soil	Date Analyzed:	03-11-10
Preservative:	Cool	Date Extracted:	03-10-10
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene Toluene Ethylbenzene p,m-Xylene	5,290 42,200 3,130 25,300	0.9 1.0 1.0 1.2
o-Xylene	4,930	0.9
Total BTEX	80,900	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	94.0 %
	1,4-difluorobenzene	99.8 %
	Bromochlorobenzene	98.5 %

References.

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

December 1996.

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

USEPA, December 1996.

Comments:

Vandewart A #1A

Analyst



Chloride

Client: Sample ID: Blagg/BP 21 BGT 5-pt @ -7' Project #: Date Reported: 94034-0010 03-11-10

Lab ID#: Sample Matrix:

53319 Soil Cool Date Sampled:
Date Received:
Date Analyzed:

03-09-10 03-10-10 03-11-10

Preservative: Condition:

Intact

Chain of Custody:

8840

Parameter

Concentration (mg/Kg)

Total Chloride

4

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:

Vandewart A #1A

Analyst

Review Wells



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

80 - 120%

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	03-12-10
Laboratory Number:	03-12-TPH.QA/QC 53330	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	03-12-10
Preservative:	N/A	Date Extracted:	03-12-10
Condition:	N/A	Analysis Needed:	TPH
Calibration I-Cal II			a design of the second
Blank Conc. (mg/Kg)	Concentrati	on Detection	Limit
TPH	ND	12.1	
Duplicate Conc. (mg/K	g) Sample 24.2	Duplicate % Differen	ace Accept. Range +/- 30%

ND = Parameter not detected at the stated detection limit.

References:

TPH

Spike Conc. (mg/Kg)

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

2,000

and Waste, USEPA Storet No. 4551, 1978.

Sample

24.2

Comments:

QA/QC for Samples 53319 and 53330 - 53332.

Analyst

Spike Added Spike Result % Recovery Accept Range

86.0%

1.740



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	03-11-10 QA/QC	Date Reported:	03-11-10
Laboratory Number:	53319	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-11-10
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	9.8401E+002	9.8441E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.1861E+002	9.1898E+002	0.04%	0 - 15%
Blank Conc. (mg/L - mg/Kg)		Concentration		Detection Limit	
Gasoline Range C5 - C10		ND		0.2	
Diesel Range C10 - C28		ND		0.1	

Total Petroleum Hydrocarbons		ND		
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept Range
Gasoline Range C5 - C10	3,290	3,270	0.6%	0 - 30%
Diesel Range C10 - C28	38.4	37.0	3.6%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
Gasoline Range C5 - C10	3,290	250	3,520	99.4%	75 - 125%
Diesel Range C10 - C28	38.4	250	294	102%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References:

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

SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 53319 - 53322 and 53326 - 53328

White m Walters



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #	N/A
Sample ID:	03-11-BT QA/QC	Date Reported:	03-11-10
Laboratory Number:	53319	Date Sampled:	N/A
Sample Matrix:	Spil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-11-10
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF: Accept. Rang	%Diff.	Blank Conc	Detect. Limit
Benzene	1.2391E+006	1.2416E+006	0.2%	ND	0.1
Toluene	1.1363E+006	1 1386E+006	0.2%	ND	0.1
Ethylbenzene	1.0241E+006	1.0262E+006	0.2%	ND	0.1
p,m-Xylene	2.5485E+006	2.5536E+006	0.2%	ND	0.1
o-Xylene	9.6023E+005	9.6216E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect Limit
Benzene	5,290	5,270	0.4%	0 - 30%	0.9
Toluene	42,200	42,000	0.5%	0 - 30%	1.0
Ethylbenzene	3,130	3,100	1.0%	0 - 30%	1.0
p,m-Xylene	25,300	25,200	0.4%	0 - 30%	1.2
o-Xylene	4,930	4,880	1.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	5,290	50.0	5,310	99.4%	39 - 150
Toluene	42,200	50.0	42,300	100%	46 - 148
Ethylbenzene	3,130	50.0	3,140	98.7%	32 - 160
p,m-Xylene	25,300	100	25,600	101%	46 - 148
o-Xylene	4,930	50.0	4,970	99.8%	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

Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments:

QA/QC for Samples 53319 - 53322 and 53326 - 53328

Analyst

Review

CHAIN OF CUSTODY RECORD

8040

Olient:	Project Name / Location:			ANALYSIS / PARAMETERS																
BALL BP	VANDEWART A # 1A			ANALIOIO / FADAMILI EDO																
Client Address:	Sampler Name:					2	21)	0												
	J. BLAC					801	180	826	S			0								
Client Phone No.: Client No.:			pou	thoc	pou	leta	nion		Ŧ		F.	Ш				00	taci			
	94034-	0010				Weth	BTEX (Method 8021)	VOC (Method 8260)	∞ ≥	/ A		with		TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
Sample No./ Sample San	ah No	Sample	No./Volume Preservative		TPH (Method 8015)	E	00	RCRA 8 Metals	tion	RCI	5	PAH	구 도	2				amp	dux	
Identification Date Tir	10	Matrix	of Containers	ers HgCl, HCl	F	В	>	E E	S	8	2	A	-	ਹ				SS	SS.	
3/9/10 120	53319	Soil Sludge Solid Aqueous	1-402			×	4							×	×				V	1
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		*						,												



5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com



