District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

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
13149 Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration OIL CONS. DIV DIST. 3
4/5 - 3/066 Permit of a pit or proposed alternative method OCT 1 4 2015 Modification to an existing permit/or registration OCT 1 4 2015
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 Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the
environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Derator: BP America Production Company OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: Roberts 002
API Number: 30045531066 OCD Permit Number:
U/L or Qtr/Qtr P Section 14 Township 29N Range 13W County: San Juan
Center of Proposed Design: Latitude <u>36.72248</u> Longitude <u>-108.16982</u> NAD: □1927 ⊠ 1983
Surface Owner: 🛛 Federal 🗌 State 🗋 Private 🗋 Tribal Trust or Indian Allotment
2. 2. 2. 2. 2. 2. 2. 2. 2. 2.
3. Below-grade tank: Subsection I of 19.15.17.11 NMAC TOOL A
Volume: 95.0 bbl 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
Liner type: Thicknessmil HDPE PVC Other
 <u>Alternative Method</u>: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school	, hospital,
institution or church)	
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
6. Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other	
Monthly inspections (If netting or screening is not physically feasible)	<u>.</u>
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:	1.
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:	2
Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.	1 2 1
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	2
9.	<u></u>
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 access	entable source
material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	pruble source
	1
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.	Yes No
- INM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.	☐ Yes ☐ No ☐ NA
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks)	Yes No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	1.2
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)	Yes No
 Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 	
Within an unstable area. (Does not apply to below grade tanks)	Yes No
 Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	
Within a 100-year floodplain. (Does not apply to below grade tanks)	Yes No
- FEMA map	
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured	Yes No
from the ordinary high-water mark).	
 Topographic map; Visual inspection (certification) of the proposed site 	_
 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)	TTD SS SS
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole,	Yes No
or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)	

Topographic map; V	visual inspection (ce	ertification) of the propos	ed site

5

 Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	Yes No
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	🗌 Yes 🗌 No
 Within 100 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	Yes No
Temporary Pit Non-low chloride drilling fluid	
 Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	Yes No
 Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	Yes No
 Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Permanent Pit or Multi-Well Fluid Management Pit	
 Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	Yes No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
 Within 500 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	Yes No
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N <i>Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.</i> Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.10 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:	cuments are
11.	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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:	
, 11 , 17	

1

Oil Conservation Division

12.	
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docume 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 Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance 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 19.15.17.9 NMAC and 19.15.17.13 NMAC	ents are
13. Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Alternative Emergency Cavitation P&A 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 Onesite Trench Burial	nagement Pit
 Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached 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 	d to the
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source mathematical provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please re 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	es 🗌 No A
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	es 🗌 No A
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	es 🗌 No A
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	es 🗌 No
r c r r	
	es 🗌 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	es 🗌 No es 🗌 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 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 	
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site Written confirmation or verification from the municipality; Written approval obtained from the municipality Y Within 300 feet of a wetland. US Eich and Wildlife Wetland Identification man; Topographic man; Visual inspection (certification) of the proposed site 	es 🗌 No

1

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	
 Written confirmation or verification from the municipality; Written approval obtained from the municipality 	Yes No
 Within the area overlying a subsurface mine. Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 	Yes No
Within an unstable area.	
 Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	Yes No
Within a 100-year floodplain. - FEMA map	Yes No
 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 19.15.17.13 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 cannel 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 beli	ef.
Name (Print): Title:	
Name (Finit) The	
Signature: Date:	
e-mail address: Telephoner	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	1 1 -
OCD Representative Signature: Approval Date: _/O/	26/15
Title: Evulronmental Spel. OCD Permit Number:	
^{19.} <u>Closure Report (required within 60 days of closure completion)</u> : 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: 7/28/2015	<u>laca</u> ra a
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)
If different from approved plan, please explain. 21.	
If different from approved plan, please explain.	dicate, by a check

Oil Conservation Division

Operator Closure Certification:

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

Name (Print): Steve Moskal

Title: Field Environmental Coordinator

Signature:

22.

Her Ma

Date: October 12, 2015

e-mail address: steven.moskal@bp.com

Telephone: (505) 326-9497

BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

<u>Roberts 002</u> <u>API No. 3004531066</u> <u>Unit Letter P, Section 14, T29N, R13W</u>

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

General Closure Plan

 BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.

No notice was made due to misunderstanding of the BGT notice requirements at that time.

2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.

No notice was made due to misunderstanding of the BGT notice requirements at that time.

- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)

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

k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
 All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

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

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

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 95 bbl BGT	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	< 0.035
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.070
TPH	US EPA Method SW-846 418.1	100	<48
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<30

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 for laboratory analysis of TPH, BTEX and chloride with results below the stated limits.

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.
 Laboratory results indicate no significant release has 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 an aboveground low profile tank was placed on the area of the former BGT.

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 under the BGT was backfilled with clean soil and an aboveground low profile tank was placed on the area of the former BGT. The area will be reclaimed after plugging and abandonment of the well.

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 under the BGT was backfilled with clean soil and an aboveground low profile tank was placed on the area of the former BGT. 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.

.

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division

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

DO DE LE DE	South St. ta Fe, NN							
Release Notifica	tion an	d Co	orrective A	ction	1			1.1.1
	OP	ERA	ГOR		🗌 Initi	ial Report	\boxtimes	Final Repor
ame of Company: BP	Conta	act: Ste	eve Moskal		A BOARD			
ddress: 200 Energy Court, Farmington, NM 87401	Telep	ohone 1	No.: 505-326-94	197	pel a la la	Sec. 1		
acility Name: Johnson 001	Facili	ity Typ	e: Natural gas	well		Ref 1		
	E				ADIN	2004521	0.00	_
urface Owner: Fee Mineral Ow					APING	0. 3004531	000	
				E act/	West Line	Country C	on Isso	
	North/South South	Line	Feet from the 1,060	East/ East	West Line	County: S	an Juai	1
Latitude <u>36.72248</u>	Lon	ngitudo	<u>-108.17037</u>		1	4.5		
NATU	REOF	REL	EASE		264			
ype of Release: N/A			Release: none		Volume	Recovered:	none	19
ource of Release: N/A			Iour of Occurrent	ce: N/A		d Hour of D		y: N/A
as Immediate Notice Given? □ Yes □ No ⊠ Not Requ	If Y		Whom?					
y Whom?	Dat	te and H	Iour:		1000	1	-	_
as a Watercourse Reached?			olume Impacting	the Wat	ercourse.	19		
a Watercourse was Impacted, Describe Fully.*			-	-	-		-	
escribe Cause of Problem and Remedial Action Taken. uring removal of a below grade tank (95 bbl), soil was sampled wit escribe Area Affected and Cleanup Action Taken. uring removal of a below grade tank, soil was sampled to ensure a	release had	not occ	curred. The attac	hed labe	pratory resu	ults indicate	no sign	ificant
pacts. The location of the BGT has been backfilled and was replater plugging and abandonment.	aced with an	above	ground low profil	e tank.	Reclamatio	on of the we	ll will ł	e executed
hereby certify that the information given above is true and complete gulations all operators are required to report and/or file certain rele ablic health or the environment. The acceptance of a C-141 report ould their operations have failed to adequately investigate and rem the environment. In addition, NMOCD acceptance of a C-141 rep deral, state, or local laws and/or regulations.	ease notifica by the NMO nediate cont	ations a OCD m aminati	nd perform correct arked as "Final R on that pose a thr	ctive act leport" of reat to g	tions for rel does not rel round wate	leases which lieve the ope r, surface wa	may e rator o ater, hu	ndanger Fliability man health
			OIL CON	SERV	ATION	DIVISIO	DN	
gnature: Manua								
inted Name: Steve Moskal	Appro	oved by	Environmental S	pecialis	it:	1.20		
inted Name. Steve Moskai	Approval Date: Expiration Date:							
tle: Field Environmental Coordinator	Appro	oval Dat	te:		Expiration	Date.		
			f Approval:		Expiration	Attached		

CLIENT: BP	API #: 3004531066 TANK ID (if applicble): A	
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE #: _1_ of _1_
QUAD/UNIT: P SEC: 14 TWP: 1/4-1/4/FOOTAGE: 1,130'S / 1,0		DATE STARTED: 07/27/15 DATE FINISHED: ENVIRONMENTAL SPECIALIST(S): NJV
2)	GPS COORD.: 36.72248 X 108.16982 DISTANCE/BEAL GPS COORD.: DISTANCE/BEAL	RING FROM W.H.:
SAMPLING DATA: 1) SAMPLE ID: 5PC-TB@5'(CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL 95) SAMPLE DATE: 07/27/15 SAMPLE TIME: 0920 LAB ANALYSIS: 801	5B/8021B/300.0 (CI)
2) SAMPLE ID:	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
APPARENT EVIDENCE OF A RELEASE OBSERVED	COHESIVE / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / OSE FIRM DENSE / VERY DENSE HC ODOR DETECTED: YES NO EXPLANATION - OF PTS. 5 ANY AREAS DISPLAYING WETNESS: YES NO EXPLAN	STIFF / VERY STIFF / HARD
SOIL IMPACT DIMENSION ESTIMATION: DEPTH TO GROUNDWATER: <		TIMATION (Cubic Yards) : <u>NA</u> CD TPH CLOSURE STD: <u>100</u> ppm
W.H. WH. PL PL PL PL PL PL PL PL PL PL	PROD. TANK BERM PBGTL T.B. ~ 5' B.G. PERIMETER SECURITY FENCE MMP ICK COMPRESSOR COMPRESSOR COMPRESSOR COMPRESSOR COMPRESSOR FENCE BARRICADE BARRICADE BARRICADE BARRICADE SECURITY FENCE COMPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~= APPROX; W.H. = WELL HEAD; WAGRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA- NOT WALL; DW-DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	

Analytical Report
Lab Order 1507C34

Date Reported: 7/29/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering Client Sample ID: 5PC-TB@5' (95) Project: Roberts #2 Collection Date: 7/27/2015 1:25:00 PM Lab ID: 1507C34-001 Matrix: MEOH (SOIL) Received Date: 7/28/2015 8:15:00 AM Analyses Result BL. Qual Units DE Date Analyzed

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS			1.1			Analyst:	LGT
Chloride	ND	30		mg/Kg	20	7/28/2015 10:49:00 AM	20481
EPA METHOD 8015M/D: DIESEL RAM	GE ORGANIC	S				Analyst:	JME
Diesel Range Organics (DRO)	ND	9.7		mg/Kg	1	7/28/2015 10:35:09 AM	20479
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	7/28/2015 10:35:09 AM	20479
Surr: DNOP	86.4	57.9-140		%REC	1	7/28/2015 10:35:09 AM	20479
EPA METHOD 8015D: GASOLINE RA	NGE					Analyst:	NSB
Gasoline Range Organics (GRO)	ND	3.5		mg/Kg	1	7/28/2015 11:57:05 AM	20460
Surr: BFB	86.8	75.4-113		%REC	1	7/28/2015 11:57:05 AM	20460
EPA METHOD 8021B: VOLATILES						Analyst:	NSB
Benzene	ND	0.035		mg/Kg	1	7/28/2015 11:57:05 AM	20460
Toluene	ND	0.035		mg/Kg	1	7/28/2015 11:57:05 AM	20460
Ethylbenzene	ND	0.035		mg/Kg	1	7/28/2015 11:57:05 AM	20460
Xylenes, Total	ND	0.070		mg/Kg	1	7/28/2015 11:57:05 AM	20460
Surr: 4-Bromofluorobenzene	89.3	80-120		%REC	1	7/28/2015 11:57:05 AM	20460

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

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	в	Analyte detected in the associated Method Blank	
	D	D Sample Diluted Due to Matrix		Value above quantitation range	
	Н	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits Page	l of 5
	ND	Not Detected at the Reporting Limit	Р	Sample pH Not In Range	1 01 5
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	
	S	% Recovery outside of range due to dilution or matrix			

WO#: 1507C34 29-Jul-15

Hall Environmental	Analysis	Laboratory,	Inc.
--------------------	----------	-------------	------

Client: Project:	Blagg Engineering Roberts #2										
Sample ID Client ID: Prep Date: Analyte	MB-20481 PBS 7/28/2015		ype: MI ID: 20 ate: 7/ PQL	481 /28/2015	F	tCode: E RunNo: 2 SeqNo: 8 %REC	7833	300.0: Anior Units: mg/H HighLimit		RPDLimit	Qual
Chloride	1.5	ND	1.5	or revalue	of it it is it is a second sec	MILLO	LOWLINIC	rightint	NICE D	TH DEMI	Gener
Sample ID Client ID:	LCS-20481 SampType: LCS LCSS Batch ID: 20481					tCode: El RunNo: 2	IS				
Prep Date:	7/28/2015	Analysis D	ate: 7	28/2015	S	SeqNo: 8	36879	Units: mg/k	(g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		15	1.5	15.00	0	98.3	90	110	· 17.11	10.0	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: 1507C34

29-Jul-15

Client: Blagg E Project: Roberts	ngineering #2													
Sample ID MB-20479 Client ID: PBS Prep Date: 7/28/2015		Type: MI h ID: 20 Date: 7/	479	F	itCode: E RunNo: 2 SeqNo: 8	7796	8015M/D: Di Units: mg/F		e Organics					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Diesel Range Organics (DRO)	ND	10		12250		1.8		and the second	1					
Motor Oil Range Organics (MRO)	ND	50												
Surr: DNOP	8.2		10.00	22.0	81.7	57.9	140	and a	To Seller	Sec.				
Sample ID LCS-20479	SampT	Type: LC	s	TestCode: EPA Method 8015M/D: Diesel Range Organics										
Client ID: LCSS	Batch	h ID: 20	479	F	RunNo: 2	7796								
Prep Date: 7/28/2015	Analysis D	Date: 7/	28/2015	5	SeqNo: 8	35969	Units: mg/M	(g						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Diesel Range Organics (DRO)	53	10	50.00	0	106	57.4	139	1.						
Surr: DNOP	4.3		5.000		86.2	57.9	140							

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: 1507C34

29-Jul-15

Client: Blagg E Project: Roberts	Engineering #2												
Sample ID MB-20460	SampType:		TestCode: EPA Method 8015D: Gasoline Range										
Client ID: PBS Prep Date: 7/27/2015	Batch ID: Analysis Date:	7/28/2015		RunNo: 23 SeqNo: 83		Units: mg/h	۲g						
Analyte	Result PQI	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Gasoline Range Organics (GRO) Surr: BFB	ND 5 860	0 1000	14.15	86.5	75.4	113			site,				
Sample ID LCS-20460	SampType:	LCS	TestCode: EPA Method 8015D: Gasoline Range										
Client ID: LCSS	Batch ID:	20460	F	RunNo: 27801									
Prep Date: 7/27/2015	Analysis Date:	7/28/2015	S	SeqNo: 8:	36260	Units: mg/k	(g						
Analyte	Result PQI	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Gasoline Range Organics (GRO)	25 5	0 25.00	0	99.2	79.6	122			100				
Surr: BFB	940	1000		94.4	75.4	113							

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix D
- Holding times for preparation or analysis exceeded H
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- Analyte detected below quantitation limits J
- P
- RL Reporting Detection Limit

Page 4 of 5

Sample pH Not In Range

Hall Environmental Analysis Laboratory, Inc.

WO#: 1507C34

29-Jul-15

Client: Blagg I Project: Roberts	Engineering s #2			- Charles				-							
Sample ID MB-20460	Samp	Туре: МІ	BLK	TestCode: EPA Method 8021B: Volatiles											
Client ID: PBS	Batc	h ID: 20	460	F	RunNo: 2	7801									
Prep Date: 7/27/2015	Analysis [Date: 7	28/2015	\$	SeqNo: 8	36278	Units: mg/l	(g							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual					
Benzene	ND	0.050	180						104 6.14						
Toluene	ND	0.050													
Ethylbenzene	ND	0.050													
Kylenes, Total	ND	0.10													
Surr: 4-Bromofluorobenzene	0.90	k	1.000	Same	90.2	80	120	3.1 30.2	10.00	1					
Sample ID LCS-20460	Samp	Type: LC	s	Tes	tCode: E	PA Method	8021B: Vola	tiles							
Client ID: LCSS	Batc	h ID: 20	460	F	RunNo: 2	7801									
Prep Date: 7/27/2015	Analysis [Date: 7/	28/2015	5	SeqNo: 8	36279	Units: mg/H	(g							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual					
Benzene	1.0	0.050	1.000	0	104	76.6	128	and the second							
Foluene	1.0	0.050	1.000	0	101	75	124								
Ethylbenzene	1.0	0.050	1.000	0	101	79.5	126								
Kylenes, Total	3.0	0.10	3.000	0	101	78.8	124								

94.1

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix

Surr: 4-Bromofluorobenzene

0.94

1.000

- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 5 of 5

120

80

ENVIRONMENTAL ANALYSIS LABORATORY TE		901 Hawki erque, NM X: 505-345	NS NE 87109 Sam	ole Log-In Chec	k List
Client Name: BLAGG Work	Order Number: 1!	507C34		RoptNo: 1	
Received by/date: A 0.1/28	115				
and the second of the second	15 8:15:00 AM		ALAMAD		
A REAL PROPERTY AND	15 8:32:00 AM		Author		
	28/15		05.0		
hain of Custody	-0/1				17.
1. Custody seals intact on sample bottles?			No 🗆	Not Present	
2. Is Chain of Custody complete?	,	res 🖌	No 🗌	Not Present	
3. How was the sample delivered?	S	Courier			
.og In					
4. Was an attempt made to cool the samples?		Yes 🗹	No 🗆	NA 🗆	
 Were all samples received at a temperature of >0° (C to 6.0°C Y	es 🗹	No 🗌	NA 🗆	
Sample(s) in proper container(s)?		Yes 🔽	No 🗌		
7. Sufficient sample volume for indicated test(s)?		res 🗹	No 🗌		
B. Are samples (except VOA and ONG) properly preser	ved?	res 🗹	No 🗌		
9. Was preservative added to bottles?	,	res 🗆	No 🗹	NA 🗆	
0. VOA vials have zero headspace?	,	res 🗌	No 🛄	No VOA Vials 🗹	
1. Were any sample containers received broken?		Yes 🗆	No 🗹	# of preserved bottles checked	
2. Docs paperwork match bottle labels? (Note discrepancies on chain of custody)	,	res 🗹	No 🗆	for pH:	unless note
3, Are matrices correctly identified on Chain of Custody	7 1	les 🗹	No 🗌	Adjusted?	
4, Is it clear what analyses were requested?		res 🗹	No 🗆		
5. Were all holding times able to be met? (If no, notify customer for authorization.)	•	les 🗸	No	Checked by:	
pecial Handling (if applicable)					
6. Was client notified of all discrepancies with this order	17 1	res 🗆	No 🗆	NA 🗹	
Person Notified:	Date				
By Whom:	Via:	eMail	Phone E Fax	In Person	
Regarding:			and the second		
Client Instructions					
7. Additional remarks:					
8. Cooler Information		110			
Cooler No Temp °C Condition Seal Intact	Seal No Sea	al Date	Signed By		
1 3.2 Good Yes					

Chain-of-Custody Record Client: BLAGG ENGR. / BP AMERICA Wailing Address: P.O. BOX 87			Turn-Around Time: SAME Standard Rush DAY Project Name: KOBERTS # 2					HALL ENVIRONMENTAL ANALYSIS LABORATORY www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109													
i			FIELD, NM 87413	Project #:			-	Te	el. 50	5-34	45-3	and the second				District of the	-410	17	-	1	-
Phone #:		(505) 63	32-1199		1							4	Analy	ysis	Rec	lnes	st				
email or F		0		Project Manag							39			17				11)	-		
	DA/QC Package: Image: Standard Image:			-son VE.		845(80218)	+ TPH (Gas only)	(MRO)			(SI)		PO4,SC	2 PCB's			water - 300.1)		4	2	
Accreditat	Accreditation:			Sampler: Nz	esson Ve	LEZ no	Ĩ	(Ga	DRO /	1	F	OSIN		VO2	8082	k J		/wa			
NELAP Other		On Ice:	Ø Yes	□ No		TPH	-	418	504	827	s	03,1	1	3.4	(YC	00.0			L NI		
	□ EDD (Type)		Sample Temperature: 2,2					(GRI	pot	pou	or	etal	CI'N	icide	(Y	ii-V(oil-3	13	all all	NCO N	
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL NO.	BTEX + MHH	BTEX + MTBE	TPH 8015B (GRO	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 /		Grau sample	S pt. curiposite sample
2/27/15	1325	SOIL	5PC-TBC5 (95)	4021	COOL	-001	V		\checkmark									\checkmark	_	v	12.7
<u></u>																					
																					+
Date: 7/27/15 Date: 27/15	Time: 1632 Time: 1815	Relinquish Relinquish	ling	Received by: <u>Ahlist</u> Received by: C	P.	Date Time 7)27/15 1632 Date Time 75 15 18 15	BI	ff Pea	RECT	LY T(200 E	inerg	gy Co		Farm	C. OTAK	1000		7401 EVH	Ø1 B	GTe	4

