District II
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 April 3, 2017

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.

<u>Pit, Below-Grade Tank, or</u> <u>Proposed Alternative Method Permit or Closure Plan Application</u>

Santa Fe, NM 87505

Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method 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.
I.
Operator: BP America Production Company OGRID #: 778 Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: DRYDEN 001E
0004505500
API Number: 3004525566 OCD Permit Number:
Center of Proposed Design: Latitude 36.63044 Longitude -107.67960 NAD83
Surface Owner: Federal State Private Tribal Trust or Indian Allotment
Pit: Subsection F, G or J of 19.15.17.11 NMAC Color Colo
Below-grade tank: Subsection I of 19.15.17.11 NMAC
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, hospital, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify

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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	
National Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: □ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. □ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial 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 300 feet 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 No Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached. Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 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 19.1 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 5.17.9 NMAC
II. Multi Wall Fluid Management Dit Cheeldigt. Subsection D of 10 15 17 0 NIMAC	
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	15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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 Falternative 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	luid Management Pit
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	
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 19.15.17.10 NMAC for guidance.	rce material are Please refer to
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
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 ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ 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	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

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 	□ Vas□ Na
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 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 cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	.11 NMAC .15.17.11 NMAC
Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and believes	ief.
Name (Print): Title:	
Signature: Date:	
Signature	
e-mail address: Telephone:	
	8106 80
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:	8106 80
e-mail address: Telephone:	
e-mail address: Telephone:	
e-mail address: Telephone:	t complete this

with this closure report is true, accurate and complete to the best of my knowledge and e closure requirements and conditions specified in the approved closure plan.
Title: Field Environmental Coordinator
Date: February 23, 2018 Telephone: (832) 609-7048

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

DRYDEN 001E

API No. 3004525566

Unit Letter I Section 28 T 28N R 08W

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.

Notice is attached.

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.

Notice was provided and is attached.

- 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 for recycling.

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
	45 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	10	< 0.011
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.42
TPH	US EPA Method SW-846 418.1 or 8015 extended	100	5000
Chlorides	US EPA Method 300.0 or 4500B	620	<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 chloride, TPH and BTEX with all concentrations below the stated limits except TPH. The release will be addressed following the spill and release guidelines. The field report and laboratory reports are 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 has occurred. The release will be addressed following the spill and release guidelines. Attached is a laboratory report and C-141.

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

Sampling results indicate a release has occurred. The release will be addressed following the spill and release guidelines. Attached is a laboratory report and field report. The location will be reclaimed when the well is plugged and abandoned.

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 will have a separator unit set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

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 will have a separator unit set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

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 will have a separator unit set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

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.

The area will have a separator unit set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

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.

The area will have a separator unit set atop BGT location. The location will be reclaimed once the well is plugged and abandoned.

- 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 including photos of reclamation completion.

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 April 3, 2017
abmit 1 Copy to appropriate District Office in

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	ase Notific	ation	and Co	rrective A	ction	1			
									■ Initia	al Report		Final Report
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			iminglo	11, INIVI 07401					ell			
Surface Ow	ner: Fed	eral		Mineral C	wner:	Federal			API No	.300452	25566	6
				LOCA	TION	OF RE	LEASE					
Unit Letter	Section	Township	Range	Feet from the			Feet from the			County	'on	luon
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			Latitud	_e 36.63044	Lo	ngitude1	07.67960	NAD	83			
				NAT	URE							
Type of Rele	ase:: none)										
Name of Company BP America Production Company Address 200 Energy Court, Farmington, NM 87401 Facility Name DRYDEN 001E Surface Owner: Federal Mineral Owner: Federal API No. 3004525566 LOCATION OF RELEASE												
Was Immedia	ate Notice (Yes 🗸	No Not Re	equired	If YES, To	Whom?					
Was a Water	course Read		Yes 🗸	No		If YES, Vo	lume Impacting t	he Wate	ercourse.			
If a Watercou	irse was Im	pacted, Descr	ibe Fully.*									
Describe Cau	se of Probl	em and Reme	dial Action	Taken.* Sampli	ng of th	e soil benea	ath the BGT was	s done	durina ren	noval. Soil	analvs	is resulted
				for Chl	orides, l	BTEX, and	TPH below BGT	closu	re standard	ds, except	TPH. T	The release
							g trie spili ariu re	elease	guidelines	. Fleid Tept	nis an	d laboratory
Describe Are	a Affected	and Cleanup A	Action Tak	en.* The relea	ase w	ill be add	ressed follo	wina	the spill	and rele	ease	
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public health	or the envi	ronment. The	acceptanc	e of a C-141 repo	rt by the	NMOCD m	arked as "Final Re	eport" d	loes not reli	eve the oper	rator of	liability
or the environ	nment. In a	ddition, NMO	CD accep									
federal, state,	or local lav	ws and/or regu	lations.				OIL CONS	SERV	ATION	DIVISIO	N	
l &	runa	wihalo	4				OIL COIN	SLAV	ATTON	DIVISIO	711	
					A	Approved by	Environmental S	pecialist				
Printed Name: Erin Garifalos												
Title: Field	d Enviro	onmenta	l Cooi	dinator	A	Approval Dat	e:2/28/20	YI	Expiration I	Date:		
E-mail Addre	erin.	garifalos	@bp.	com			19		-			
				0072224 800 3120 87 3			FF			Attached		
				(002) 003-70	-10	/	1 11 1	117	1200	227	0	
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bp



BP America Production Company 200 Energy Court Farmington, NM 87401

December 19, 2017

Bureau of Land Management Whitney Thomas 6251 College Suite A Farmington, NM 87402

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank Well Name: DRYDEN 001E API #: 3004525566

Dear Mrs. Thomas,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about December 26, 2017. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required please contact me for a specific time (832)-609-7048.

Sincerely,

Erin Garifalos

BP America Production Company

From:

Buckley, Farrah (CH2M HILL)

To:

Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)

Cc:

jeffcblagg@aol.com; blagg_njv@yahoo.com; Garifalos, Erin

Subject: Date: RE: BP Pit Close Notification - DRYDEN 001E Friday, December 22, 2017 9:03:14 AM

The work on this site is scheduled for Tuesday, December 26th at 12:30pm.

Thanks.

Farrah

From: Buckley, Farrah (CH2M HILL)

Sent: Tuesday, December 19, 2017 3:56 PM

To: 'Smith, Cory, EMNRD'; 'Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)'

Cc: 'jeffcblagg@aol.com'; 'blagg_njv@yahoo.com'; Garifalos, Erin

Subject: BP Pit Close Notification - DRYDEN 001E

BP America Production Company

200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

SENT VIA E-MAIL TO: <u>CORY.SMITH@STATE.NM.US</u>; <u>VANESSA.FIELDS@STATE.NM.US</u>

December 19, 2017

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

DRYDEN 001E API 30-045-25566 (I) Section 28 – T28N – R08W San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close two 45bbl BGTs that will no longer be operational at

this well site. We anticipate this work to start on or around December 26, 2017.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Erin Garifalos

Field Environmental Coordinator - San Juan

Cell: 832-609-7048

Farrah Buckley
BGT Project Support

970-946-9199 -cell

This email and any attachments are intended only for the addressee(s) listed above and may contain confidential, proprietary, and/or privileged information. If you are not an intended recipient, please immediately

advise the sender by return email, delete this email and any attachments, and destroy any copies of same. Any unauthorized review, use, copying disclosure or distribution of this email and any attachments is prohibited.

, CLIENT? BP	BLAGG E P.O. BOX 87, B (50		API #: 300452 TANK ID (if applicble):	25566 A	
FIELD REPORT:	(circle one): BGT CONFIRMATION	RELEASE INVESTIGATION / OTI	HER:	PAGE#: 1	of
SITE INFORMATION QUAD/UNIT: SEC: 28 TWP:	st: NM	DATE STARTED: 12	2/26/17		
1/4 - 1/4/FOOTAGE: 1,905'S / 580 LEASE #: NM012200		TYPE: FEDERAL/STATE/F STRIKE ONTRACTOR: BP-J.GON		ENVIRONMENTAL SPECIALIST(S):	NJV
REFERENCE POINT 1) 45 BGT (SW/DB) - A 2)	WELL HEAD (W.H.) GPS GPS COORD.: 36	36.63032 6.63044 X 107.67960	X 107.67936 DISTANCE/BEA	RING FROM W.H.: 92.5' RING FROM W.H.:	, N66W
SAMPLING DATA: 1) SAMPLE ID: 5PC - TB @ 5' (4' 2) SAMPLE ID: 3) SAMPLE ID: 5	SAMPLE DATE:	5/17 SAMPLE TIME: 1250 D	AB ANALYSIS: 80° AB ANALYSIS: BANALYSIS:	15B/8021B/300.0 (CI)	READING (ppm)
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: L/			
	ODERATE BROWN Y COHESIVE / COHESIVE / HIGHLY COHESIVE DOSE FIRM DENSE / VERY DENSE ET / SATURATED / SUPER SATURATED OF PTS. 5	PLASTICITY (CLAYS): NON PLASTIC / DENSITY (COHESIVE CLAYS & SII HC ODOR DETECTED: YES NO EXAMPLE OF THE PLAYING WETNESS:	SLIGHTLY PLASTIC / C LTS): SOFT / FIRM / XPLANATION -	STIFF / VERY STIFF / HARD	
SITE OBSERVATION APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA: OTHER: NMOCD OR BLM REPS. NOT PR	D AND/OR OCCURRED: YES / NO EXPL YES NO EXPLANATION - SEPAR	ANATION:ATOR UNIT TO BE SET ATOP E	BGT LOCATION.		
EXCAVATION DIMENSION ESTIMATION: DEPTH TO GROUNDWATER: <100' N SITE SKETCH	NAft. XNA EAREST WATER SOURCE: >1,000 BGT Located: off / on sit		<1,000' NMOO	CALIB. GAS = 100	NA 100 ppm PF = 1.00 ppm
	(45)-A BERM		N	MISCELL. NO	12/26/17
	PBGTL T.B. ~ 5' B.G. FEN	TO W.H.	R V P	10	/14/10
NOTES: BGT = BELOW-GRADE TANK: E.D. = EXCAVATIO	PARATOR ON DEPRESSION: B.G. = BELOW GRADE: B = BI	X	- S.P.D.	OVM = Organic Vapor ppm = parts per millio	on / / N
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL	OW-GRADE TANK LOCATION; SPD = SAMPLE F E WALL; DW - DOUBLE WALL; SB - SINGLE BOT	POINT DESIGNATION; R.W. = RETAINING WA	ALL; NA - NOT N	lagnetic declination:	10° E

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB@ 5' (45)-A

Project: Dryden 1E

Collection Date: 12/26/2017 12:50:00 PM

Lab ID: 1712E50-001

Matrix: MEOH (SOIL) Received Da

Received Date: 12/27/2017 7:30:00 AM

Analyses	Result	PQL Q	ual Units	DF	Date Analyzed Batch
EPA METHOD 300.0: ANIONS					Analyst: MRA
Chloride	ND	30	mg/Kg	20	12/27/2017 12:05:16 PM 35727
EPA METHOD 8015M/D: DIESEL RANG	E ORGANICS				Analyst: TOM
Diesel Range Organics (DRO)	2700	95	mg/Kg	10	12/27/2017 12:22:40 PM 35726
Motor Oil Range Organics (MRO)	2300	480	mg/Kg	10	12/27/2017 12:22:40 PM 35726
Surr: DNOP	0	70-130	S %Rec	10	12/27/2017 12:22:40 PM 35726
EPA METHOD 8015D: GASOLINE RAN	GE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	21	mg/Kg	5	12/27/2017 10:39:33 AM 35687
Surr: BFB	75.7	15-316	%Rec	5	12/27/2017 10:39:33 AM 35687
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.11	mg/Kg	5	12/27/2017 10:39:33 AM 35687
Toluene	ND	0.21	mg/Kg	5	12/27/2017 10:39:33 AM 35687
Ethylbenzene	ND	0.21	mg/Kg	5	12/27/2017 10:39:33 AM 35687
Xylenes, Total	ND	0.42	mg/Kg	5	12/27/2017 10:39:33 AM 35687
Surr: 4-Bromofluorobenzene	90.0	80-120	%Rec	5	12/27/2017 10:39:33 AM 35687

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

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
- PQL Practical Quanitative Limit
 - 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 Page 1 of 6
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

ENVIRONMENTAL YSIS LABORATORY allenvironmental.com
illenvironmental.com
· Albuquerque, NM 87109
Analysis Request
3 3
O4,SO4) PCB's r-300.1)
19181 1 71 1 1
/ 8082 / 8082 \)
S (O3,1
CI,N (CI,N DA)
S (F, S)(F, S (F, S (F, S (F, S (F, S (F, S)(F, S)(F, S)(F, S (F, S (F, S)(F,
Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄) 8081 Pesticides / 8082 PCB's 8260B (VOA) 8270 (Semi-VOA) Chloride (soil - 300.0 / water - 300.1) Grab sample 5 pt. composite sample
2 2 8 8 8 5 5 5 V
O BP USING THE CONTACT WITH CORRESPONDING
WHEN APPLICABLE: LLOS / VANCE HIXON
2
_

Hall Environmental Analysis Laboratory, Inc.

WO#:

1712E50

29-Dec-17

Client:

Blagg Engineering

Project:

Dryden 1E

Sample ID MB-35727

SampType: mblk

TestCode: EPA Method 300.0: Anions

TestCode: EPA Method 300.0: Anions

LowLimit

Client ID:

PBS

Batch ID: 35727

RunNo: 48035

Prep Date: 12/27/2017

Analysis Date: 12/27/2017

SeqNo: 1540826

Units: mg/Kg

Analyte Chloride

PQL

SPK value SPK Ref Val %REC LowLimit

HighLimit

%RPD

RPDLimit

Qual

Result

1.5

Sample ID LCS-35727 LCSS

SampType: Ics Batch ID: 35727

RunNo: 48035

Units: mg/Kg

Client ID: Prep Date:

12/27/2017

Analysis Date: 12/27/2017

ND

SeqNo: 1540827

%RPD **RPDLimit**

Qual

PQL SPK value SPK Ref Val

15.00

%REC 96.6

Analyte

Chloride

1.5

Result

0

90

HighLimit

14

110

Qualifiers:

D

Value exceeds Maximum Contaminant Level.

Sample Diluted Due to Matrix Holding times for preparation or analysis exceeded H

ND Not Detected at the Reporting Limit Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix

В Analyte detected in the associated Method Blank

Value above quantitation range J Analyte detected below quantitation limits

Sample container temperature is out of limit as specified

Reporting Detection Limit

Sample pH Not In Range

Page 3 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1712E50

29-Dec-17

Client:

Blagg Engineering

Project:

Dryden 1E

Sample ID LCS-35726	SampType: LCS			Test	TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID: LCSS	Batch ID: 35726 RunNo: 48027					8027				
Prep Date: 12/27/2017	Analysis Da	te: 12	2/27/2017	SeqNo: 1539266			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	95.6	73.2	114			
Surr: DNOP	4.7		5.000		93.4	70	130			

Sample ID MB-35726	SampType: MBLK			TestCode: EPA Method 8015M/D: Diesel Range Organics						
Client ID: PBS	Batch	ID: 35	726	R	RunNo: 4	8027				
Prep Date: 12/27/2017	Analysis D	ate: 12	2/27/2017	S	SeqNo: 1	539267	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								

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

PQL Practical Quanitative Limit

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

Analyte detected below quantitation

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified

Page 4 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1712E50

29-Dec-17

Client:

Blagg Engineering

Project:

Dryden 1E

Sample ID MB-35687	SampT	ype: ME	BLK	TestCode: EPA Method 8015D: Gasoline Range						
Client ID: PBS	Batch ID: 35687 RunNo: 48031									
Prep Date: 12/22/2017	Analysis D	ate: 12	2/27/2017	S	eqNo: 1	539740	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	830		1000		83.5	15	316			

Sample ID LCS-35687	SampType: LCS TestCode: E				EPA Method 8015D: Gasoline Range					
Client ID: LCSS	Batch ID:	35687	R	RunNo: 4	8031					
Prep Date: 12/22/2017	Analysis Date:	12/27/2017	S	SeqNo: 1	539741	Units: mg/K	(g			
Analyte	Result PC	QL SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Gasoline Range Organics (GRO)	27	5.0 25.00	0	108	75.9	131				
Surr: BFB	960	1000		96.3	15	316				

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Η Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix

Analyte detected in the associated Method Blank

Value above quantitation range E

J Analyte detected below quantitation limits

Reporting Detection Limit

Sample pH Not In Range

RL

Sample container temperature is out of limit as specified

Page 5 of 6

Hall Environmental Analysis Laboratory, Inc.

WO#:

1712E50

29-Dec-17

Client:

Blagg Engineering

Project:

Dryden 1E

Sample ID MB-35687	SampType: MBLK			Tes							
Client ID: PBS	Batch ID: 35687			F	RunNo: 4	8031					
Prep Date: 12/22/2017	Analysis D	ate: 12	2/27/2017	2017 SeqNo: 1539781			Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	ND	0.025									
Toluene	ND	0.050									
Ethylbenzene	ND	0.050									
Xylenes, Total	ND	0.10									
Surr: 4-Bromofluorobenzene	0.96		1.000		96.5	80	120				
Sample ID LCS-35687	SampT	SampType: LCS TestCode: EPA Method 8021B: Volatiles									

Sample ID LCS-35687	SampT	SampType: LCS TestCode: EPA Method					8021B: Volat	tiles		
Client ID: LCSS	Batch	1D: 35	687	RunNo: 48031						
Prep Date: 12/22/2017	Analysis D	ate: 12	2/27/2017	S	SeqNo: 1	539782	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.025	1.000	0	93.0	77.3	128			
Toluene	0.95	0.050	1.000	0	94.9	79.2	125			
Ethylbenzene	0.94	0.050	1.000	0	94.3	80.7	127			
Xylenes, Total	2.9	0.10	3.000	0	95.9	81.6	129			
Surr: 4-Bromofluorobenzene	0.97		1.000		97.3	80	120			

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
- PQL Practical Quanitative Limit
- 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
- W Sample container temperature is out of limit as specified

Page 6 of 6



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name:	BLAGG	Work Order Nu	mber: 1712E50		RcptNo:	1
Received By:	Sophia Campuzano	12/27/2017 7:30:	00 AM	Sophia Carpen	-	
Completed By:	Sophia Campuzano	12/27/2017 8:45:	09 AM	Sophie Carper	_	
Reviewed By:	IMO	12/27/21		, ,		
		101-101				
Chain of Cus	stody					
1. Custody sea	als intact on sample bottles?		Yes	No 🗌	Not Present	
2. Is Chain of	Custody complete?		Yes 🗹	No 🗌	Not Present	
3. How was the	e sample delivered?		Courier			
Log In					*	
4. Was an atte	empt made to cool the samp	les?	Yes 🗹	No 🗆	NA 🗆	
5. Were all sai	mples received at a tempera	ture of >0° C to 6.0°C	Yes ☑	No 🗆	NA 🗆	
6. Sample(s) i	n proper container(s)?		Yes 🗹	No 🗆		
7. Sufficient sa	emple volume for indicated to	est(s)?	Yes 🗹	No 🗆		
8. Are samples	(except VOA and ONG) pro	operly preserved?	Yes. 🗹	No 🗌		
9. Was presen	vative added to bottles?		Yes	No 🗹	NA 🗆	
10.VOA vials h	ave zero headspace?		Yes	No 🗆	No VOA Viais ✓	
11. Were any s	ample containers received b	roken?	Yes 🗆	No 🗹	# of preserved	
					bottles checked	
	work match bottle labels? pancies on chain of custody)	Yes 🗹	No 🗔	for pH: (<2 or	>12 unless noted)
	s correctly identified on Chai		Yes 🗹	No 🔲	Adjusted?	
	nat analyses were requested		Yes 🗹	No 🗆		
	ding times able to be met?		Yes 🗹	No 🗆	Checked by:	
(if no, notify	customer for authorization.)					
Special Hand	lling (if applicable)					
	notified of all discrepancies w	vith this order?	Yes 🗌	No 🗆	NA 🗹	
Perso	n Notified:	D	ate:			
By Wi	nom:	V	ia: eMail Ph	none Fax	In Person	
Regar	ding:				man had a graphy and a fact that a graphy of a fact that the graphy of the security of the sec	
Client	Instructions:					
17. Additional r	emarks:					
18. Cooler Info		Lazaran a	7. F 2			
Cooler N		Seal Intact Seal N	o Seal Date	Signed By		
	3.3 Good	1105				



