Form C-144 July 21, 2008

District I	State of N	ew Mexico
1625 N. French Dr., Hobbs, NM 88240	Energy Minerals an	d Natural Resource
District II 1301 W. Grand Avenue, Artesia, NM 88210	Depa	rtment
1301 W. Grand Avenue, Artesia, NM 88210 District III	Oil Conserva	ation Division
1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 2 7	1220 South S 1 23 Santa Fe,	St. Francis Dr. NM 87505

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.

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

### Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action:	Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
	Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
	☐ Modification to an existing permit
	Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system,
below-grade tank	x, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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.

Operator: Elm Ridge Exploration	OGRID #: 149052
Address: P.O. Box 156, Bloomfield, NM 87413	
Facility or well name: Campos #2	
API Number: 3003905162 OCD Permit Number:	
U/L or Qtr/Qtr K Section 4 Township 23N Range 7W	County: Rio Arriba
Center of Proposed Design: Latitude 36.254014 Longitude -107.581741 N	AD: □1927 ⊠ 1983
Surface Owner: X Federal X State Private Tribal Trust or Indian Allotment	
2.	
Pit: Subsection F or G of 19.15.17.11 NMAC	
Temporary: Drilling Workover	
Permanent Emergency Cavitation P&A	
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC	C Other
☐ String-Reinforced	
Liner Seams:  Welded Factory Other Volume: Volume:	bbl Dimensions: L x W x D
3.	
Closed-loop System: Subsection H of 19.15.17.11 NMAC	
Type of Operation:  P&A Drilling a new well Workover or Drilling (Applies to activi intent)	ities which require prior approval of a permit or notice of
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other	
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ H	PVC Other
Liner Seams:	
4.	
Volume: <u>27</u> bbl Type of fluid: <u>Produced water</u>	
Tank Construction material: Fixed roof fiberglass tank	
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and autor	matic overflow shut-off
☐ Visible sidewalls and liner ☒ Visible sidewalls only ☒ Other <u>Single-walled tank</u>	
Liner type: Thicknessmil	
5.	
Alternative Method:	
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Envi	vironmental Bureau office for consideration of approval.

(24)

· -	
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,
7.  Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)  □ Screen □ Netting ☒ Other solid cone top	
Monthly inspections (If netting or screening is not physically feasible)	
8.  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 19.15.3.103 NMAC	
9.  Administrative Approvals 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:  Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	office for
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 accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the approach office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	priate district pproval.
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.  The iWATERS database search shows a water well approximately 1.5 miles to the south-east with a depth to water of 900 feet. This water well has an elevation nearly 10 feet lower than the elevation of the well site, indicating that groundwater is at a depth of more than 50 feet from the bottom of the BGT.	☐ Yes ☑ No
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).  The nearest watercourse is 2,062.4 ft. east per attached topographic map. These findings are reflected by the attached visual inspection sheet.	☐ Yes ⊠ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  The attached aerial photograph and visual inspection sheet indicate that none of the above locations are within 1000 feet of the well site.	☐ Yes ☑ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits)	☐ Yes ☐ No ☑ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.  The attached visual inspection sheet and iWATERS database search indicate that the well site is not within 1000 feet of a water well.	☐ 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.  The site is not within incorporated municipal boundaries per the attached topographical map and visual inspection sheet.	☐ Yes ⊠ No
Within 500 feet of a wetland.  The USFWS data file, WetlandsData.kmz, dated July 2, 2008, was opened using Google Earth. No wetlands were noted.	☐ Yes ☑ No
Within the area overlying a subsurface mine.  The attached NM EMNRD web map indicates the well site is not within an area overlying a subsurface mine.	☐ Yes ⊠ No
Within an unstable area.  The attached topographical map and visual inspection sheet indicates this site is not within an unstable area.	☐ Yes ☑ No
Within a 100-year floodplain.  The attached FEMA map indicates the well site is not within a 100-year flood plain.	☐ Yes ☒ No

11.
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are
attached.
☐ Hydrogeologic Report (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 19.15.17.9 NMAC
and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:
12.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are
attached.
Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
Siting Criteria Compliance Demonstrations (only for on-site closure) - 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 19.15.17.9 NMAC
and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design)  API Number:
Previously Approved Operating and Maintenance Plan API Number: (Applies only to closed-loop system that use
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
13.  Down and Dide Descrit Application Chaptelists, Culturation D of 10 15 17 0 NM AC
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.
Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
Climatological Factors Assessment
Critified 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 <sub>2</sub> S, Prevention Plan
☐ Indisance of Hazardous Odols, including H₂S, Prevention Fiant ☐ 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
Closure Than Cases upon the appropriate requirements of Subsection C of 17.13.17.7 Wifte and 17.13.17.13 Wifte
14.
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 Closed-loop System
Alternative
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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)
15. Waste Execution and Demoval Closure Plan Cheeklists (10.15.17.13 NMAC) Instructions, Each of the following items must be attached to the
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the
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
<ul> <li>Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC</li> <li>Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)</li> </ul>
<ul> <li>Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC</li> <li>Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC</li> </ul>
23 Site Assistantation Frant - based upon the appropriate requirements of Subsection O of 19.15.17.15 NIVIAC

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.1 Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if facilities are required.	
Disposal Facility Name: Disposal Facility Permit Number:	
Disposal Facility Name: Disposal Facility Permit Number:	
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future ser   Yes (If yes, please provide the information below)  No	vice and operations?
Required for impacted areas which will not be used for future service and operations:  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 G of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC	С
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 sout provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate dist considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justi demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	rict office or may be
Ground water is less than 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 between 50 and 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
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 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 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 private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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
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 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ 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
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ 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 F of 19.15.17.13 NMAC   Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC   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   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 F of 19.15.17.13 NMAC   Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 G of 19.15.17.13 NMAC	15.17.11 NMAC

,	
Operator Application Certification:	
I hereby certify that the information submitted with this application is true, account	surate and complete to the best of my knowledge and belief.
Name (Print): Amy Mackey	itle: Administrative Manager
Signature: Mu actel	Date: 1-23-09
E-mail address <u>amackey1@elmridge.net</u>	Telephone: (505) 632-3476 ext. 201
20.	
OCD Approval: Permit Application (including closure plan) Closure	Plan (only) OCD Conditions (see attachment)
OCD Representative Signature:	Approval Date:
Title:	OCD Permit Number:
Closure Report (required within 60 days of closure completion): Subsection Instructions: Operators are required to obtain an approved closure plan prior The closure report is required to be submitted to the division within 60 days of section of the form until an approved closure plan has been obtained and the	r to implementing any closure activities and submitting the closure report. f the completion of the closure activities. Please do not complete this
22.	
Closure Method:  Waste Excavation and Removal On-Site Closure Method Alte If different from approved plan, please explain.	rnative Closure Method  Waste Removal (Closed-loop systems only)
Closure Report Regarding Waste Removal Closure For Closed-loop System Instructions: Please indentify the facility or facilities for where the liquids, at two facilities were utilized.	rilling fluids and drill cuttings were disposed. Use attachment if more than
Disposal Facility Name:	Disposal Facility Permit Number:
Disposal Facility Name:	Disposal Facility Permit Number:
Were the closed-loop system operations and associated activities performed on  Yes (If yes, please demonstrate compliance to the items below) No	or in areas that will not be used for future service and operations?
Required for impacted areas which will not be used for future service and oper  Site Reclamation (Photo Documentation)  Soil Backfilling and Cover Installation  Re-vegetation Application Rates and Seeding Technique	ations:
24.	
Closure Report Attachment Checklist: Instructions: Each of the following mark in the box, that the documents are attached.  Proof of Closure Notice (surface owner and division)  Proof of Deed Notice (required for on-site closure)  Plot Plan (for on-site closures and temporary pits)  Confirmation Sampling Analytical Results (if applicable)  Waste Material Sampling Analytical Results (required for on-site closure)  Disposal Facility Name and Permit Number  Soil Backfilling and Cover Installation  Re-vegetation Application Rates and Seeding Technique  Site Reclamation (Photo Documentation)	
	gitude NAD:
Operator Closure Certification:  I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure requires.	e report is true, accurate and complete to the best of my knowledge and ements and conditions specified in the approved closure plan.
Name (Print):	
Signature:	Date:
E-mail address:	Telephone:

## New Mexico Office of the State Engineer POD Reports and Downloads

Township: 23	N Range: 07W	Sections:		
NAD27 X:	Y:	Zone:	Search Radius:	
County:	Basin:		Number:	Suffix:
Owner Name: (First)	(L	ast) All	ONon-Domestic	ODomestic
POD /	Surface Data Repor	rt A	Avg Depth to Water Report	)
	Clear Form	iWATERS	Menu Help	

#### AVERAGE DEPTH OF WATER REPORT 10/29/2008

								(Depth	Water	in	Feet)
Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max		Avg
SJ	23N	07W	10				1	900	900		900

Record Count: 1

#### New Mexico Office of the State Engineer POD Reports and Downloads

Township: 23N Range: 07W Sections: 4

NAD27 X:

Zone:

Search Radius:

County:

Basin:

Number:

Suffix:

Owner Name: (First)

(Last)

POD / Surface Data Report Avg Depth to Water Report Water Column Report

Clear Form iWATERS Menu Help

POD / SURFACE DATA REPORT 09/24/2008

(acre ft per annum)

ï

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are biggest to smallest X I are in Feet

UTM are in Meters)

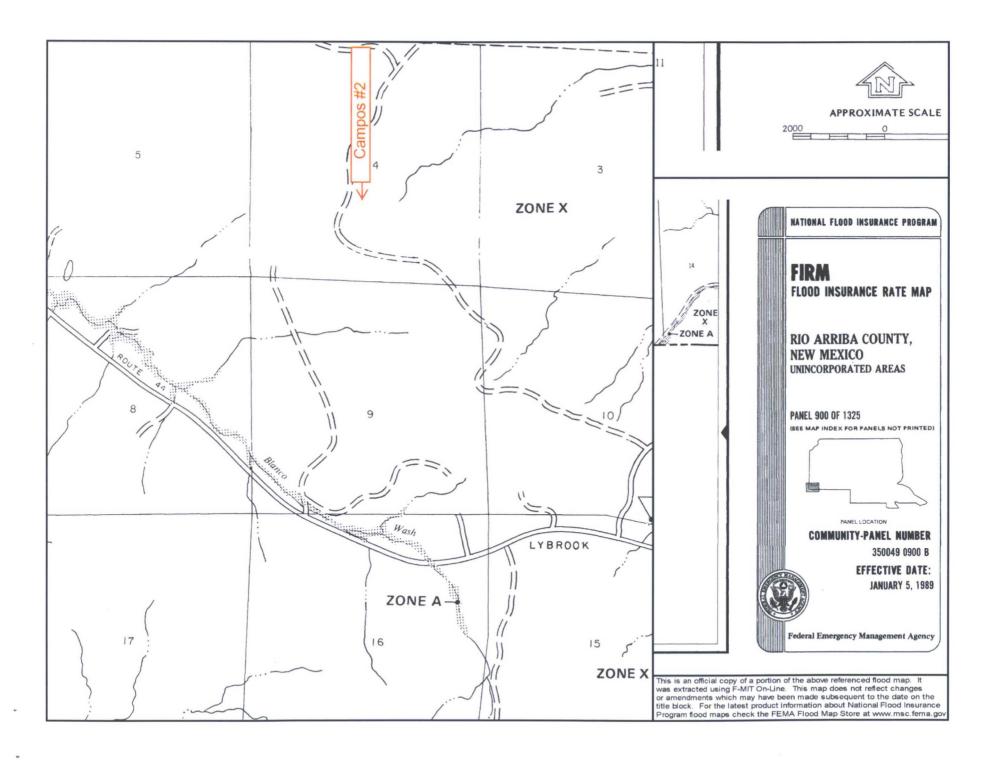
Start

Finish Depth Depth (in feet)

Well Water

No Records found, try again





# Elm Ridge Exploration Mine Map

#### Mines, Mills & Quarries Commodity Groups **Aggregate & Stone Mines Coal Mines** Industrial Minerals Mines **Industrial Minerals Mills** Metal Mines and Mill Concentrate Potash Mines & Refineries Smelters & Refinery Ops. **Uranium Mines Uranium Mills** Mines, Mills & Quarries Status **Active Mining Active Mining, Active Reclamation** Permanent Closure, Active Reclamation Permanent Closure, Reclaimed Awaiting Bond Release **Temporary Suspension**

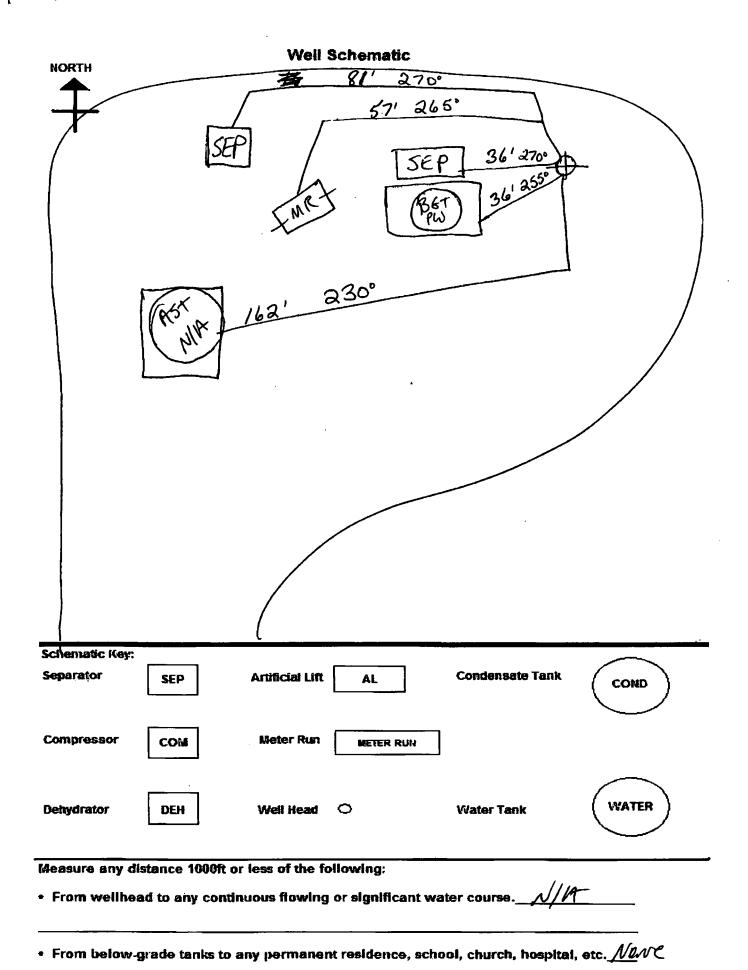






Elm Ridge Site Inventory Sheet Time: Started: 11:55 Ended: 12:15 Date: 8/5/8 Initials: SCO (amons Well Name & Number: API#: 3003905162 Lease #: NMSF078272A  $\frac{4}{\sqrt{2}}$  Township: 23N Range: 7WQuarter/Quarter: \_ K Section: Lat: 36.254014° -107, 581741° GPS Point ID: Camo 2 Long: Pit Tank #1: Manufacturer: Serial #:\_\_\_*N/IA*--Size N//7 bbl DOM: o If N/A - Dimensions: Diameter Height Materiai: Galvanized\_\_\_ Fiberglass Steel \_\_\_ Tank Configuration: Double Wall Single Wall \_\_\_\_\_\_ (Burled\_\_\_\_ or Exposed\_\_\_\_\_) Visible Walls: Y No Label

Leak Detection: Y \_\_\_\_\_ Contents: Produced Water X Condensate\_\_\_\_ Recycled Oil\_\_\_\_ Tank Top Covering: Solid/Cone-top\_X Netting\_\_\_ (Solid\_\_\_Fiber\_\_\_) Secondary Containment: Yes X No\_\_\_ No\_X Fencing around berm: Yes\_\_\_\_ o Fence Type: Cattle Panel N/A Field Fence N/A Barbwire N/A Pit Tank #2: Manufacturer: DOM:\_\_\_\_\_ Size bbl Serial #: If N/A - Dimensions: Diameter Height Galvanized\_\_\_\_\_ Material: Steel Fiberglass Tank Configuration: Double Wall Single Wail \_\_\_\_\_(Burled\_\_\_\_ or Exposed\_\_\_) Visible Walls: Y\_\_\_\_ N\_\_\_ Leak Detection: Y\_\_\_\_ N\_\_\_\_ Contents: Produced Water Condensate\_\_\_\_ Recycled Oil\_\_\_\_ Tank Top Covering: Solld/Cone-top\_\_\_\_ Netting\_\_\_\_ (Solid\_\_ Fiber\_\_\_) Secondary Containment: Yes\_\_\_\_ No\_\_\_ Fencing around berm: Yes\_\_\_\_ No\_\_\_ Field Fence\_\_\_\_ o Fence Type: Cattle Panel\_\_\_\_ Barbwire Above-Ground Tank #1: Manufacturer: Amedican DOM: 7-54 Serial #: 383 Size 300 bbi o If N/A – Dimensions: Diameter\_ /21 Height Material: Steel X Galvanized Fiberglass\_\_\_\_ Condensate NA (State #2-57-1)
No Label Contents: Produced Water Recycled Oil N/ 1 Secondary Containment: Yes X



## BELOW GRADE TANK (BGT) CLOSURE PLAN

#### **SITE NAME:**

CAMPOS #2
UNIT LETTER K, SECTION 4, TOWNSHIP 23N, RANGE 7W
RIO ARRIBA COUNTY, NEW MEXICO
LATITUDE 36.254014 LONGITUDE -107.581741

#### **SUBMITTED TO:**

MR. WAYNE PRICE
NEW MEXICO OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DRIVE
SANTA FE, NEW MEXICO 87505
(505) 476-3490

#### SUBMITTED BY:

Ms. Amy Mackey
ELM RIDGE EXPLORATION
P.O. Box 156
BLOOMFIELD, NEW MEXICO 87413
(505) 632-3476 Ext. 201

**JANUARY 2009** 

# BELOW GRADE TANK (BGT) CLOSURE PLAN ELM RIDGE EXPLORATION CAMPOS #2 RIO ARRIBA COUNTY, NEW MEXICO

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#### Introduction

Elm Ridge Exploration would like to submit a closure plan for the below grade tank (BGT) at the Campos #2 well site located in the NE ¼ SW ¼ of Section 4, Township 23N, Range 7W, Rio Arriba County, New Mexico. This closure plan has been prepared in conformance with the closure requirements of 19.15.17.13 NMAC.

#### **SCOPE OF CLOSURE ACTIVITIES**

The purpose of this closure plan is to provide the details of activities involved in the closure of the BGT at the Campos #2 well site. The following scope of closure activities has been designed to meet this objective:

- 1) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will close all of the BGTs currently in service within the five (5) years allotted. Elm Ridge Exploration does not operate any BGTs which would qualify to be upgraded or retrofitted; as such they will be closing all their current BGTs and replacing them with above ground storage tanks.
- 2) Elm Ridge Exploration will close BGTs deemed to be an imminent danger to fresh water, public health, or the environment by an earlier date that the division requires as specified in Subsection A of 19.15.17.13 NMAC.
- 3) Elm Ridge Exploration will close any BGT which demonstrates a compromise of integrity before the five (5) years allotted by the division per Paragraph (6) of Subsection I of 19.15.17.11 NMAC.
- 4) Elm Ridge Exploration will close any BGT within 60 days of cessation of the BGTs operation per Subsection A of 19.15.17.13 NMAC.
- 5) No less than 72 hours and no greater than one (1) week prior to BGT removal Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will provide written notification to the appropriate division district office as well as a schedule of on-site activities, as in accordance with 19.15.17.13 Subsection J Paragraph (2) NMAC. Written notification will include the name of the well operator, the well's API number, the well's name and number, and the well's unit letter, section, township, and range.
- 6) No less than 24 hours and no greater than one (1) week prior to beginning BGT closure activities Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will provide written notification to the appropriate surface owner, as in accordance with 19.15.17.13 Subsection J Paragraph (1) NMAC. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will notify the surface owner by certified mail, return receipt requested, that the operator plans to close a below-grade tank. The return receipt will be used to ensure that the surface owner has received written notification no less than 24 hours and no greater than one (1) week prior to the beginning of BGT closure activities. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement. Closure activities that will take place on tribal land will have notifications sent by certified mail, return

receipt requested, to the appropriate tribal office. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will notify the Bureau of Land Management (BLM) of closure activities for wells located on federal land per a Sundry Notice, as in accordance with 19.15.17.13 Subsection J Paragraph (1) NMAC. All notices will be sent in such a way that the surface owner received notice at least 24 hours prior to the beginning of closure activities.

- 7) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will remove all liquids, and/or sludge, if applicable, prior to closure. Material will be disposed of at Envirotech's Landfarm #2, Permit # NM-01-0011, TNT Environmental Inc. Landfarm, Permit # NM-01-0008, Industrial Ecosystems Inc. (IEI) Landfarm, Permit # NM-01-0010B or Basin Disposal, Permit # NM-01-0005, depending on the consistence of the material removed, as in accordance with 19.15.17.13 Subsection E Paragraph (1) NMAC.
- 8) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will remove all on-site equipment associated with this BGT that is no longer required for some other purpose, as in accordance with 19.15.17.13 Subsection E Paragraphs (3) NMAC.
- 9) If applicable, any liners or leak detection systems removed from a BGT closure will be cleaned off and disposed of at San Juan County Regional Landfill in accordance with Subparagraph (m) of Paragraph (1) of Subsection D of 19.15.9.712 NMAC.
- 10) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will obtain prior approval from the OCD to dispose, recycle, reuse, or reclaim the BGT. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will provide the OCD with documentation concerning the final disposition of the BGT with the closure report.
- 11) Once the BGT is removed a five (5)-point composite sample will be collected from directly below the tank or below the leak detection system if present. Grab samples will be collected from any area that are wet, discolored, or showing other evidence of a release. All samples being collected will be analyzed for benzene and total BTEX via USEPA Method 8021B, TPH via USEPA Method 418.1, and chlorides via USEPA 300.1, as in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
- 12) Depending on soil sample results the area will be either backfilled or the area will be excavated.
  - a. If soil samples do not exceed the regulatory standards of 0.2 mg/kg benzene, 50 mg/kg BTEX, 100 mg/kg TPH, and 250 mg/kg or background concentration of chlorides, as in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
    - i. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, shall submit a Form C-141 with the laboratory results so that the division may review the results to determine if additional delineation is required in accordance with Paragraph (5) of Subsection E of 19.15.17.13 NMAC.
    - ii. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will backfill the excavation or impacted area with non-waste containing, earthen material, in accordance with 19.15.17.13

Subsection E Paragraph (6) NMAC. A soil cover shall be installed for all backfilled excavations consisting of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater in accordance with Subsections H of 19.15.17.13 NMAC. The operator shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

iii. All areas of the well site that are no longer utilized on a day to day basis for the production of oil and/or gas, Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will substantially restore, re-contour, and re-vegetate the areas, in accordance with 19.15.17.13 Subsections G and I NMAC. The operator shall notify the division when it has been re-seeded and when it has achieved successful re-vegetation. For re-vegetation methods, please see attached re-vegetation plan.

b. If soil samples exceed the regulatory standards stated above.

- i. Elm Ridge Exploration will submit a Release Notification by Form C-141 with the appropriate analytical laboratory results to the appropriate division district office, in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
- ii. In accordance with Paragraph (5) of Subsection E of 19.15.17.13 NMAC, once the operator or the OCD has determined that a release has occurred, Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will comply with rule 19.15.3.116 NMAC and 19.15.1.19 NMAC as appropriate.

#### REPORTING

Elm Ridge Exploration will submit a closure report within 60 days following the BGT closure. The closure report will consist of a form C-144 with all supporting data, and a form C-141 with all supporting data. The supporting data will include proof of closure notice to the surface owner and the OCD, confirmation sampling analytical results, a site diagram, soil backfilling and cover installation, re-vegetation rates, re-seeding techniques, and site reclamation photo documentation, if applicable, along with all other information related to the onsite activities.

We appreciate the opportunity to be of service. If you have any questions or require further information, please do not hesitate to contact our office at (505) 632-3476 Ext. 201.

Respectfully Submitted:

Elm Ridge Exploration

Amy Mackey

Elm Ridge Exploration

#### **Elm Ridge Exploration**

#### San Juan Basin

#### **Below Grade Tank Maintenance and Operating Plan**

In accordance with Rule 19.15.17 the following information describes the operation and maintenance of a Below Grade Tank (BGT) on Elm Ridge Exploration locations. This particular location does not meet the siting criteria to operate a BGT, and thus will be closing the BGT within five (5) years, or upon failure of integrity, and replacing it with an above ground storage tank.

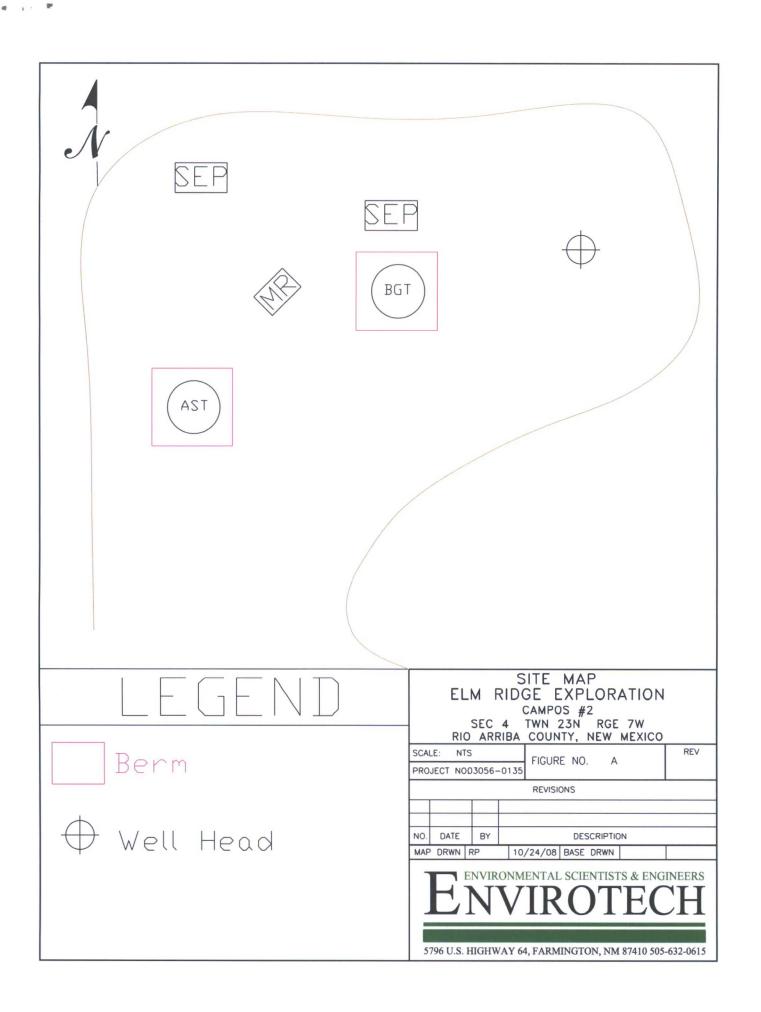
#### **GENERAL PLAN:**

- 1. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, will operate and maintain a BGT to contain liquids and solids to prevent contamination of fresh water and to protect public health and environment. This will be accomplished by performing monthly inspections of the BGT, any liners or leak detection, if applicable, netting, secondary containment, fencing, and maintaining adequate freeboard.
- 2. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall not allow a BGT to overflow or allow surface water run-on to enter the BGT. This will be accomplished by a secondary containment consisting of a soil berm around the BGT that will be monitored by monthly inspections. Overflowing will be prevented by maintaining an adequate freeboard of eight (8) inches, maintained by monthly inspections. This process will be performed on the current BGT located at this well site.
- 3. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall continuously remove any visible or measurable layer of oil from the fluid surface of a BGT in an effort to prevent the accumulation of oil over time.
- 4. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall inspect the BGT at least once monthly and maintain a written record of each inspection for at least five (5) years. The monthly inspection form to be used by Elm Ridge Exploration is attached to this document.
- 5. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall maintain adequate freeboard to prevent overtopping of the BGT. The standard freeboard to be maintained by Elm Ridge Exploration is eight (8) inches.
- 6. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall maintain an expanded metal covering on the BGT.

- 7. Elm Ridge Exploration will not discharge into or store any hazardous wastes in the BGT.
- 8. If Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, determines that a BGT has developed a leak below the liquid's surface, then Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, will notify the appropriate division office within 48 hours of discovering the leak. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall remove all liquids above the damage or leak line within 48 hours in accordance with Subsection A of 19.15.17.12 NMAC. The damaged tank will then be removed and closure activities will begin in accordance with the submitted closure plan.
- 9. Elm Ridge Exploration will begin closure activities for any BGT in cession for 60 days.
- 10. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, will close the BGT within the NMOCD allotted five (5) years, within 60 days of cession of the BGT or upon failure of integrity, and put into service an above ground storage tank to meet the needs previously fulfilled by the BGT.

Figure A, Site Map

Attachment 1, Monthly BGT Inspection Form



### Elm Ridge Exploration, LLC

#### **Monthly Below Grade Tank Inspection Form**

Inspection Performed By: Date:
Well Site Name:
Unit: Section: Township: Range: County:
Quarter Footage:
Latitude: Longitude:
Below Grade Tank
Construction Material of BGT (circle one): Steel Fiberglass Galvanized Other:
Tank Capacity (BBLS):
Status of Tank (circle one): NA poor fair good excellent
Leaks Detected (circle one): Yes No Unknown
Liquid level in tank from the top:
Recent overflow detected (circle one): Yes No Unknown
BGT Cover present: Yes No NA
Cover Type (circle one): wire mesh steel mesh fibrous netting other:
Berm Present (circle one): Yes No
Secondary Containment
Type of secondary containment:
Status of secondary containment (circle one): NA poor fair good excellent
Fencing
Fencing Present (circle one): Yes No
Describe Fencing:
Status of Fencing (circle one): NA poor fair good excellent

<sup>\*</sup>Maintain this document on record for a minimum of five (5) years from the date performed.

# OCD Aztec District III ELM RIDGE Checklist Below Grade Tank Closure Plans

19.15.17.9 Permit application
Signed C-144 (Page 5 of C-144)
Site Specific Hydrogeology (Iwaters)
19.15.17.10 Siting requirements
Proximity to watercourses (Topo map)
Proximity to Permanent Structure (Aerial Map)
Proximity to Flood Plain Map (Aerial Map)
Proximity to Subsurface Mines Map (Aerial Map)
10.45.47.42.Classing Diam
19.15.17.13 Closure Plan
Below Grade Tank Closure Plan
19.15.17.12 Operating and Maintenance Plan  Below Grade Tank Operating and Maintenance Plan
Requirements: (Application Marked Closure Plan Only
05/15/11
Registration Date: VF (CS) 7 // 7/ / 6