

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

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.

16433  
Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- 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.

1.  
Operator: BP AMERICA PRODUCTION COMPANY \_\_\_\_\_ OGRID #: 778 \_\_\_\_\_  
Address: 380 North Airport Road, Durango, CO 81303 \_\_\_\_\_  
Facility or well name: STOREY LS 009 \_\_\_\_\_  
API Number: 3004521112 \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr D \_\_\_\_\_ Section 34 \_\_\_\_\_ Township 28 \_\_\_\_\_ Range 08W \_\_\_\_\_ County: San Juan County \_\_\_\_\_  
Center of Proposed Design: Latitude 36.6229 \_\_\_\_\_ Longitude -107.67449 \_\_\_\_\_ NAD83  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** A  
Volume: 45 \_\_\_\_\_ 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 ☐ Other SINGLE WALLED DOUBLE BOTTOMED \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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)

7.  
**Signs:** Subsection C of 19.15.17.11 NMAC  
☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  
☐ Signed in compliance with 19.15.16.8 NMAC

8.  
**Variances and Exceptions:**  
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.  
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC  
**Instructions:** *The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

### 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  
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. (**Does not apply to below grade tanks**)

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☐ No

### Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

### Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No



|   |  |
|---|--|
| <p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p><b><u>Temporary Pit Non-low chloride drilling fluid</u></b></p>  |  |
| <p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>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;</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul> | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p><b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b></p>   |  |
| <p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>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.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No |

10.

**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: \_\_\_\_\_

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 documents are 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 19.15.17.9 NMAC and 19.15.17.13 NMAC  
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.  
**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
- ☐ 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<sub>2</sub>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

13.  
**Proposed Closure:** 19.15.17.13 NMAC

*Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.*

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ 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

14.  
**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
- ☐ 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

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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.*

|   |   |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> 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).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> 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.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance   |   |



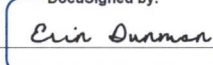
|   |  |
|---|--|
| adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division                                 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map     | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within a 100-year floodplain.<br>- FEMA map   | <input type="checkbox"/> Yes <input type="checkbox"/> No |

16.  
**On-Site 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.*

|   |
|---|
| <input type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  |
| <input type="checkbox"/> Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  |
| <input type="checkbox"/> Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC              |
| <input type="checkbox"/> Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC      |
| <input type="checkbox"/> Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC   |
| <input type="checkbox"/> Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC   |
| <input type="checkbox"/> Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC   |
| <input type="checkbox"/> Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved) |
| <input type="checkbox"/> Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  |
| <input type="checkbox"/> Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC   |
| <input type="checkbox"/> Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  |

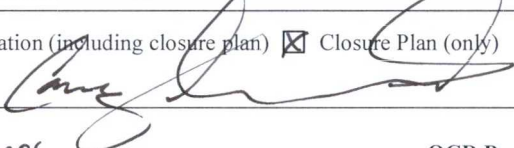
17.  
**Operator Application Certification:**  
 I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Erin Dunman Title: Field Environmental Coordinator

Signature:  Date: 08/01/2018

e-mail address: erin.dunman@bpx.com Telephone: 832-609-7048

18.  
**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 8/20/18

Title: Environmental Spec OCD Permit Number: \_\_\_\_\_

19.  
**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC  
*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☐ Closure Completion Date: \_\_\_\_\_

20.  
**Closure Method:**

☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)

☐ If different from approved plan, please explain.

21.  
**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

|  |
|--|
| <input type="checkbox"/> Proof of Closure Notice (surface owner and division)                      |
| <input type="checkbox"/> Proof of Deed Notice (required for on-site closure for private land only) |
| <input type="checkbox"/> Plot Plan (for on-site closures and temporary pits)                       |
| <input type="checkbox"/> Confirmation Sampling Analytical Results (if applicable)                  |
| <input type="checkbox"/> Waste Material Sampling Analytical Results (required for on-site closure) |
| <input type="checkbox"/> Disposal Facility Name and Permit Number                                  |
| <input type="checkbox"/> Soil Backfilling and Cover Installation                                   |
| <input type="checkbox"/> Re-vegetation Application Rates and Seeding Technique                     |
| <input type="checkbox"/> Site Reclamation (Photo Documentation)                                    |

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

22.

**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): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_



# **SITING AND HYDRO-GEOLOGICAL REPORT FOR STOREY LS 009**

## **SITING CRITERIA 19.15.17.10 NMAC**

Depth to groundwater at the site is estimated to be between 50 and 100 feet (ft.) below ground surface (bgs). This estimation is based on data from Stone and others (1983), depth to groundwater data obtained from water wells permitted by the New Mexico State Engineer's Office (attached), and a nearby cathodic protection well. Local topography and proximity to adjacent water features are also considered. An aerial map provided as Figure 4, demonstrates that there are no freshwater wells or springs used for public or livestock consumption within 200 feet of the proposed BGT position. A topographic map (Figure 2) demonstrates that the BGT is not within 100 feet of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake as measured from the ordinary high water mark.

## **LOCAL GEOLOGY AND HYDROLOGY**

This particular site is located on level ground near the main channel of Largo Canyon. Regional topography of Largo Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The more resistant cliff-forming sandstones of the San Jose Formation cap the interbedded siltstones, shales and sandstones of the Nacimiento Formation. Accumulations of talus and eroded sands at the base of canyon walls form steep to gentle slopes that transition into flat-bottomed arroyos within the canyons. Deposits of Quaternary alluvial and eolian sands occur prominently near the surface of Largo Canyon, especially near streams and washes

Groundwater is estimated to be between 50 and 100 feet below ground surface (bgs) at this site. This is based on the elevation difference between the site and Largo Canyon of approximately 60 feet. Largo Canyon is approximately 700 feet southwest of the site.

## **REGIONAL GEOLOGY AND HYDROLOGY**

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft<sup>2</sup>/d (Stone et al, 1983). Groundwater within these aquifers flows toward the San Juan River.

## **REFERENCES**

- Circular 154—Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976
- Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p

**Public Land Survey System (PLSS)**

☐ Q64:  Q16:  Q4:  Sec:  Tws:  Rng:

**State Plane Coordinate System - NAD27**

☐ X:  ft Y:  ft Zone:

**State Plane Coordinate System - NAD83**

☐ X:  ft Y:  ft Zone:

**Degrees/Minutes/Seconds**

☒ **Longitude (X):** Degrees:  ° Minutes:  ' Seconds:  "  
**Latitude (Y):** Degrees:  ° Minutes:  ' Seconds:  "

**UTM - NAD27**

☐ Easting (X):  mtrs Northing (Y):  mtrs Zone:

**SUBMIT****All Conversion Results are displayed as NAD 1983 UTM Zone 13**

Easting (X):  mtrs Northing (Y):  mtrs

~~ Please keep screen open to copy UTM values for Reports. ~~





# New Mexico Office of the State Engineer

## Wells with Well Log Information

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed)

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

(NAD83 UTM in meters)

(in feet)

| POD Number                    | POD Sub-Code | basin | County   | Source | q  | q  | q   | Sec | Tws | Rng | X      | Y        | Distance | Start Date | Finish Date | Log File Date | Depth Well | Depth Water | Driller                | License Number |
|-------------------------------|--------------|-------|----------|--------|----|----|-----|-----|-----|-----|--------|----------|----------|------------|-------------|---------------|------------|-------------|------------------------|----------------|
| <a href="#">SJ 02283</a>      | SJ           | SJ    | Shallow  | 1      | 2  | 4  | 14  | 28N | 08W |     | 263604 | 4060474* | 4946     | 06/07/1990 | 06/10/1990  | 06/25/1990    | 540        | 480         | CHIVERA DRILLING CO.   | 809            |
| <a href="#">SJ 00163 S</a>    | SJ           | SJ    | Artesian | 2      | 4  | 4  | 18  | 28N | 08W |     | 257354 | 4060237* | 5204     | 09/04/1978 | 09/06/1978  | 09/13/1978    | 1450       | 800         |                        | 727            |
| <a href="#">SJ 04071 POD1</a> | SJ           | SJ    | Shallow  | 1      | 4  | 33 | 29N | 08W |     |     | 260647 | 4062627  | 6258     | 01/06/2014 | 01/29/2014  | 02/14/2014    | 750        | 640         | BAILEY, MARK           | 1357           |
| <a href="#">SJ 03116</a>      | SJ           | RA    | Shallow  | 3      | 3  | 3  | 21  | 28N | 07W |     | 268738 | 4058093* | 8084     | 09/18/2001 | 09/20/2001  | 10/04/2001    | 98         | 20          | HARGIS, WILLIAM CALVIN | 1508           |
| <a href="#">SJ 02314</a>      | SJ           | RA    | Shallow  | 3      | 3  | 17 | 27N | 07W |     |     | 266864 | 4050051* | 8732     | 07/20/1991 | 08/29/1991  | 03/20/1992    | 355        | 320         | CHIVERS, BONNIE        | 809            |
| <a href="#">SJ 04029 POD1</a> | SJ           | RA    | Shallow  | 4      | 3  | 3  | 17  | 27N | 07W |     | 266994 | 4049907  | 8925     | 11/13/2012 | 11/27/2012  | 12/03/2012    | 520        | 300         | MARK BAILEY            | 1357           |
| <a href="#">SJ 00006</a>      | SJ           | SJ    | Shallow  | 2      | 26 |    | 29N | 08W |     |     | 264013 | 4064891* | 9091     | 01/27/1953 | 01/27/1953  | 11/17/1953    | 560        |             | UNKNOWN                |                |
| <a href="#">SJ 03965 POD1</a> | SJ           | SJ    | Shallow  | 3      | 1  | 2  | 26  | 29N | 08W |     | 264591 | 4064831  | 9254     | 05/11/2011 | 05/25/2011  | 06/01/2011    | 340        | 290         | MARK BAILEY            | 1357           |
| <a href="#">SJ 00005</a>      | SJ           | SJ    | Shallow  | 3      | 21 |    | 29N | 08W |     |     | 260073 | 4065803* | 9462     | 03/23/1953 | 03/23/1953  | 11/17/1953    | 606        | 406         | UNKNOWN                |                |
| <a href="#">SJ 00025</a>      | SJ           | SJ    | Shallow  | 3      | 21 |    | 29N | 08W |     |     | 260073 | 4065803* | 9462     | 03/23/1953 | 03/29/1953  | 12/03/1953    | 606        | 406         | CONLEY COX             |                |

Record Count: 10

UTMNAD83 Radius Search (in meters):

Easting (X): 260839.15

Northing (Y): 4056372

Radius: 10000

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

8/3/18 9:47 AM

Page 1 of 1

WELLS WITH WELL LOG INFORMATION



# New Mexico Office of the State Engineer

## Wells Without Well Log Information

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

| POD Number                          | POD  |          | County | Source  | q q q |    |   | Sec | Tws | Rng | X      | Y        | Distance |
|-------------------------------------|------|----------|--------|---------|-------|----|---|-----|-----|-----|--------|----------|----------|
|                                     | Code | Subbasin |        |         | 64    | 16 | 4 |     |     |     |        |          |          |
| <a href="#">SJ 00209 -AMENDED-S</a> | O    |          | SJ     | Shallow | 1     | 1  | 4 | 17  | 28N | 08W | 258371 | 4060609* | 4903     |
| <a href="#">SJ 00209 S</a>          |      | SJ       | SJ     | Shallow | 1     | 1  | 4 | 17  | 28N | 08W | 258371 | 4060609* | 4903     |
| <a href="#">SJ 00209</a>            |      | SJ       | SJ     | Shallow | 1     | 2  | 3 | 17  | 28N | 08W | 257969 | 4060618* | 5125     |
| <a href="#">SJ 02800</a>            |      | SJ       | SJ     |         | 3     | 2  | 4 | 24  | 28N | 09W | 255555 | 4058960* | 5883     |
| <a href="#">SJ 04069 POD6</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255454 | 4062703  | 8312     |
| <a href="#">SJ 04069 POD2</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255453 | 4062710  | 8317     |
| <a href="#">SJ 04069 POD7</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255457 | 4062722  | 8324     |
| <a href="#">SJ 04069 POD1</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255451 | 4062721  | 8327     |
| <a href="#">SJ 04069 POD8</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255435 | 4062711  | 8330     |
| <a href="#">SJ 04069 POD9</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255435 | 4062723  | 8339     |
| <a href="#">SJ 04069 POD5</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255447 | 4062735  | 8341     |
| <a href="#">SJ 04069 POD10</a>      |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255419 | 4062712  | 8341     |
| <a href="#">SJ 04069 POD3</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255421 | 4062724  | 8349     |
| <a href="#">SJ 04069 POD4</a>       |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255420 | 4062736  | 8359     |
| <a href="#">SJ 04069 POD11</a>      |      | SJ       | SJ     |         | 1     | 4  | 3 | 36  | 29N | 09W | 255408 | 4062726  | 8359     |
| <a href="#">SJ 02874</a>            |      | SJ       | RA     |         | 3     | 2  | 4 | 28  | 28N | 07W | 269911 | 4056857* | 9084     |

Record Count: 16

UTMNAD83 Radius Search (in meters):

Easting (X): 260839.15

Northing (Y): 4056372

Radius: 10000

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



#4 30-045-07121

#11 30-045-21078

DATA SHEET FOR DEEP GROUND BED CATHODIC PROTECTION WELLS  
NORTHWESTERN NEW MEXICO  
(Submit 3 copies to OCD Aztec Office)

Operator MERIDIAN OIL Location: Unit SW Sec. 27 Twp 28 Rng 8

Name of Well/Wells or Pipeline Serviced HOWELL #4, #11

cps 473w

Elevation 6280' Completion Date 10/12/73 Total Depth 680' Land Type\* N/A

Casing, Sizes, Types & Depths N/A

If Casing is cemented, show amounts & types used N/A

If Cement or Bentonite Plugs have been placed, show depths & amounts used

N/A

Depths & thickness of water zones with description of water when possible:

Fresh, Clear, Salty, Sulphur, Etc. 470'

Depths gas encountered: N/A

Type & amount of coke breeze used: 6800 lbs.

Depths anodes placed: 628', 620', 612', 604', 596', 588', 580', 572', 564', 556', 548'  
540

Depths vent pipes placed: N/A

Vent pipe perforations: 500'

Remarks: qb #2

**RECEIVED**

MAY 31 1991

OIL C

If any of the above data is unavailable, please indicate so. Copies of all logs, including Drillers Log, Water Analyses & Well Bore Schematics should be submitted when available. Unplugged abandoned wells are to be included.

\*Land Type may be shown: F-Federal; I-Indian; S-State; P-Fee.  
If Federal or Indian, add Lease Number.

DATA SHEET FOR DEEP GROUND BED CATHODIC PROTECTION WELLS  
NORTHWESTERN NEW MEXICO  
(Submit 3 copies to OCD Aztec Office)

Operator MERIDIAN OIL Location: Unit SW Sec 27 Twp 28 Rng 8

Name of Well/Wells or Pipeline Serviced HOWELL #4, #11

cps 473w

Elevation 6280' Completion Date 3/31/64 Total Depth 320' Land Type\* N/A

Casing, Sizes, Types & Depths N/A

If Casing is cemented, show amounts & types used N/A

If Cement or Bentonite Plugs have been placed, show depths & amounts used

N/A

Depths & thickness of water zones with description of water when possible:

Fresh, Clear, Salty, Sulphur, Etc. N/A

Depths gas encountered: N/A

Type & amount of coke breeze used: 3700 lbs.

Depths anodes placed: 297', 249', 243', 190', 165', 80', 74'

Depths vent pipes placed: N/A

Vent pipe perforations: N/A

Remarks: gb #1

**RECEIVED**

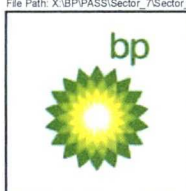
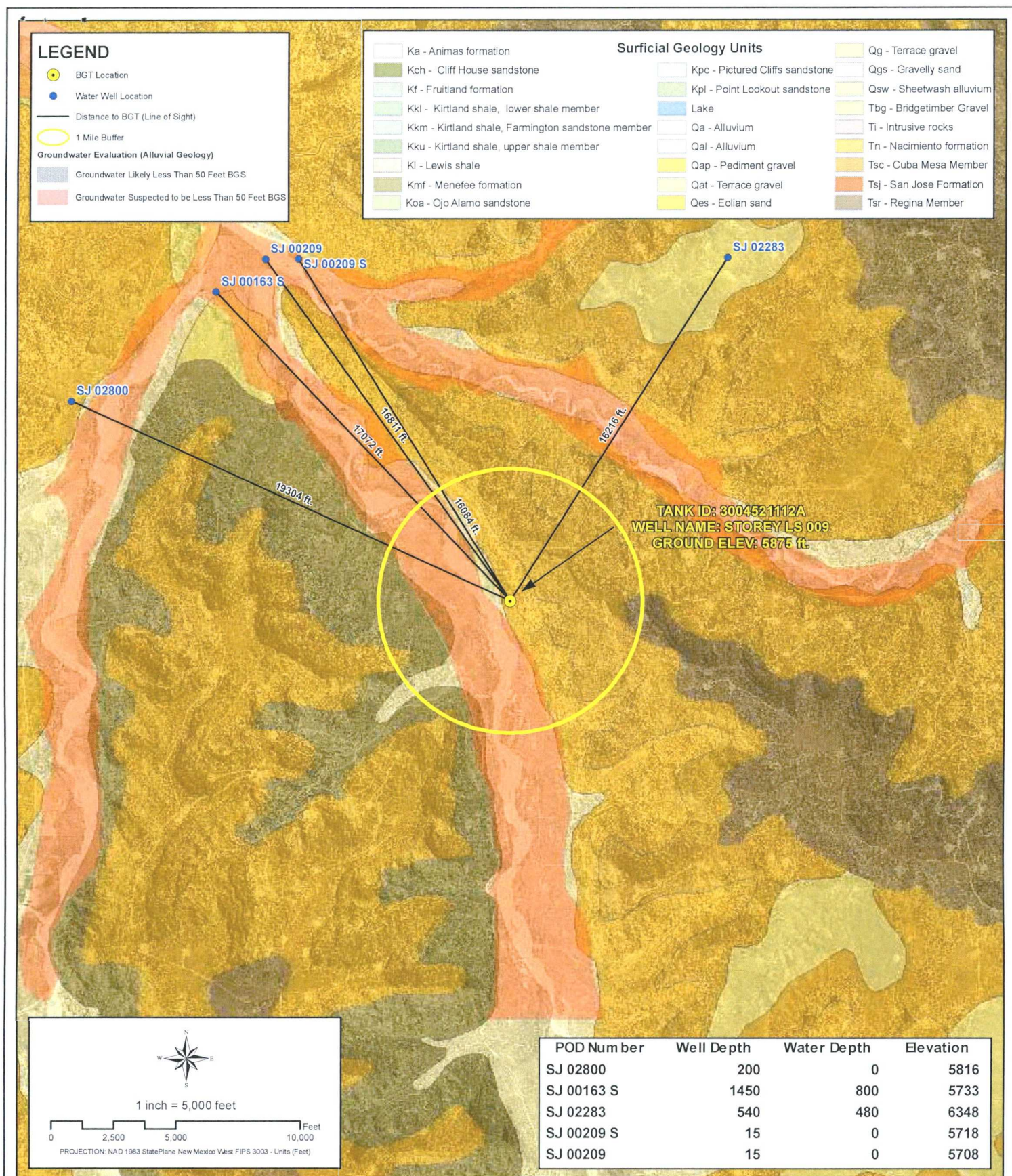
MAY 31 1991

OIL CON. DIV  
DIST. 3

If any of the above data is unavailable, please indicate so. Copies of all logs, including Drillers Log, Water Analyses & Well Bore Schematics should be submitted when available. Unplugged abandoned wells are to be included.

\*Land Type may be shown: F-Federal; I-Indian; S-State; P-Fee.  
If Federal or Indian, add Lease Number.





# GROUNDWATER LESS THAN 50 FT.

**WELL NAME: STOREY LS 009**

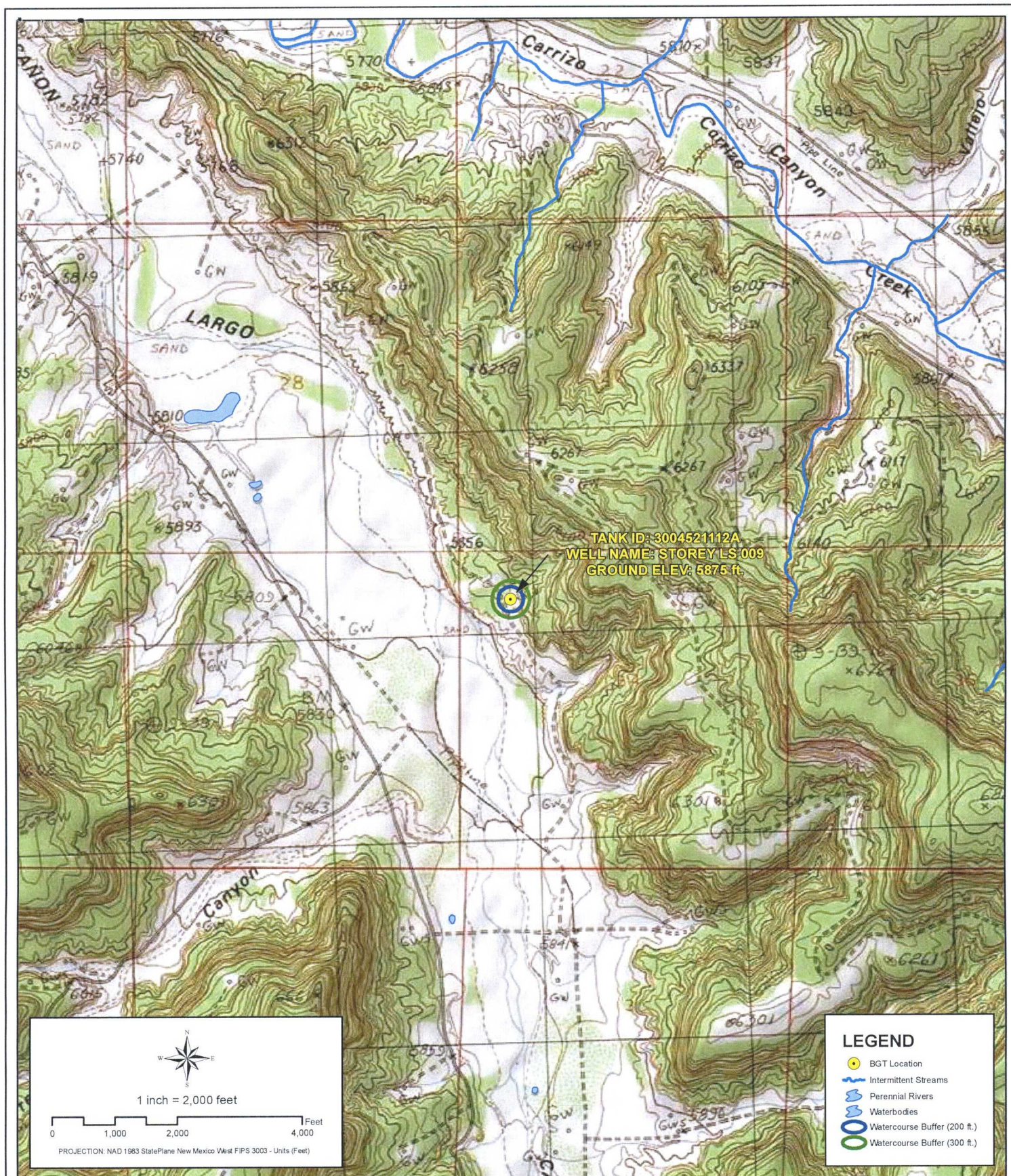
**API NUMBER: 3004521112 TANK ID: 3004521112A**

**SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23**

**FIGURE**

**1**





## PROXIMITY TO WATERCOURSES

**WELL NAME: STOREY LS 009**

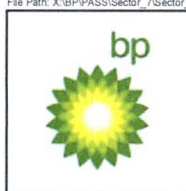
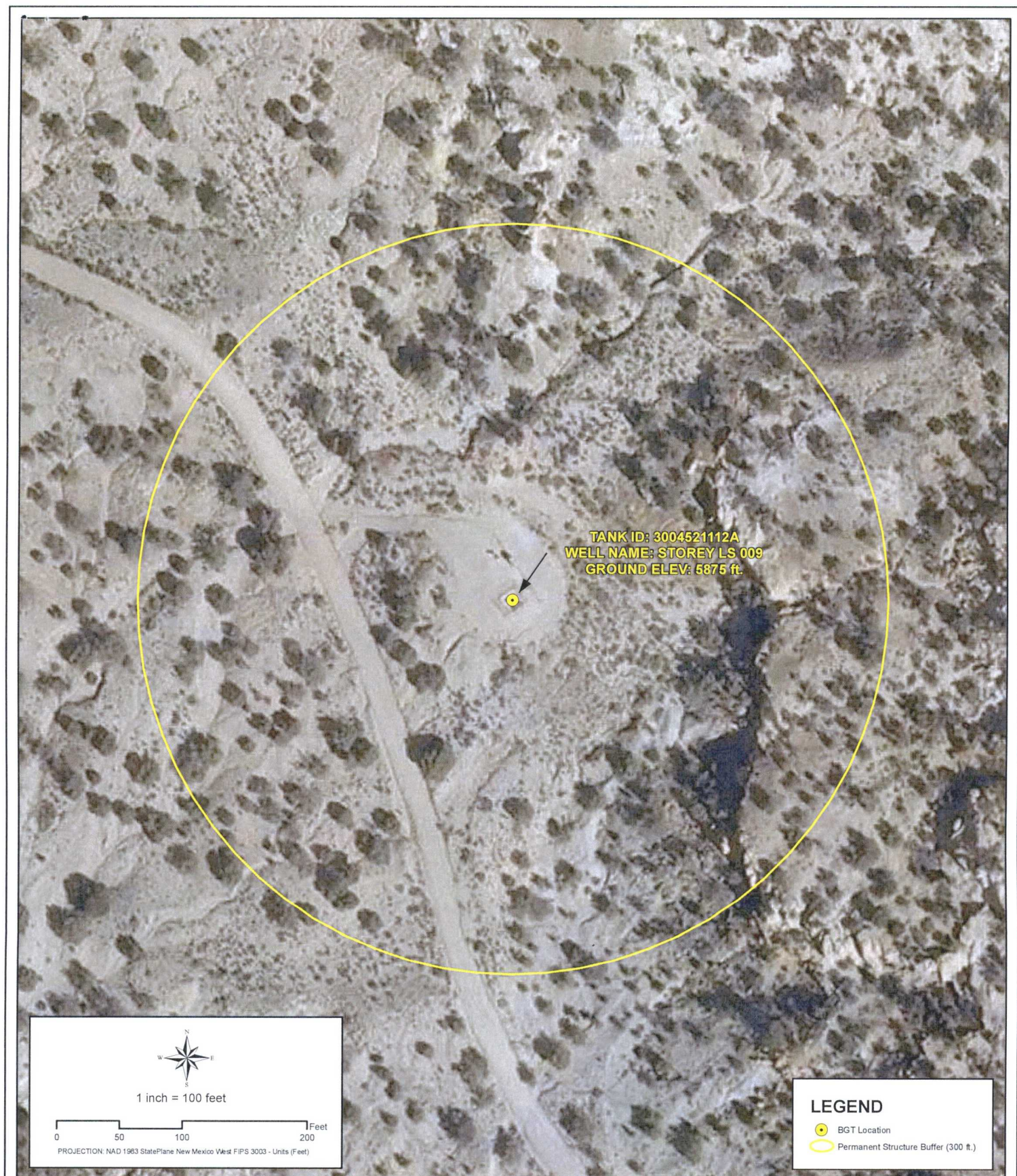
API NUMBER: 3004521112 TANK ID: 3004521112A

SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE

2





## PROXIMITY TO PERMANENT STRUCTURE

WELL NAME: STOREY LS 009

API NUMBER: 3004521112 TANK ID: 3004521112A  
SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE  
3





## PROXIMITY TO WATER WELLS

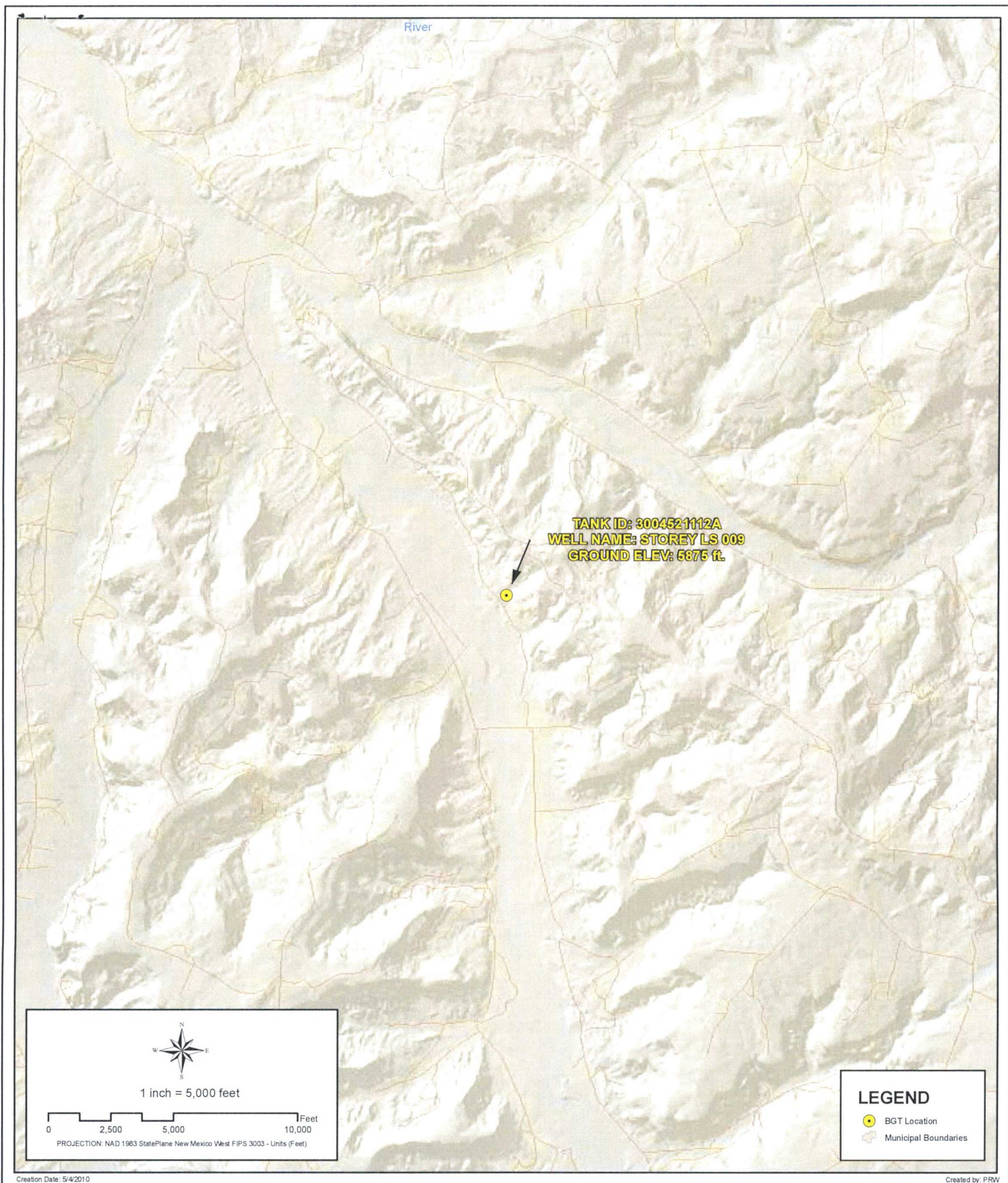
**WELL NAME: STOREY LS 009**

API NUMBER: 3004521112 TANK ID: 3004521112A  
SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE

4





## PROXIMITY TO MUNICIPAL BOUNDARY

WELL NAME: STOREY LS 009

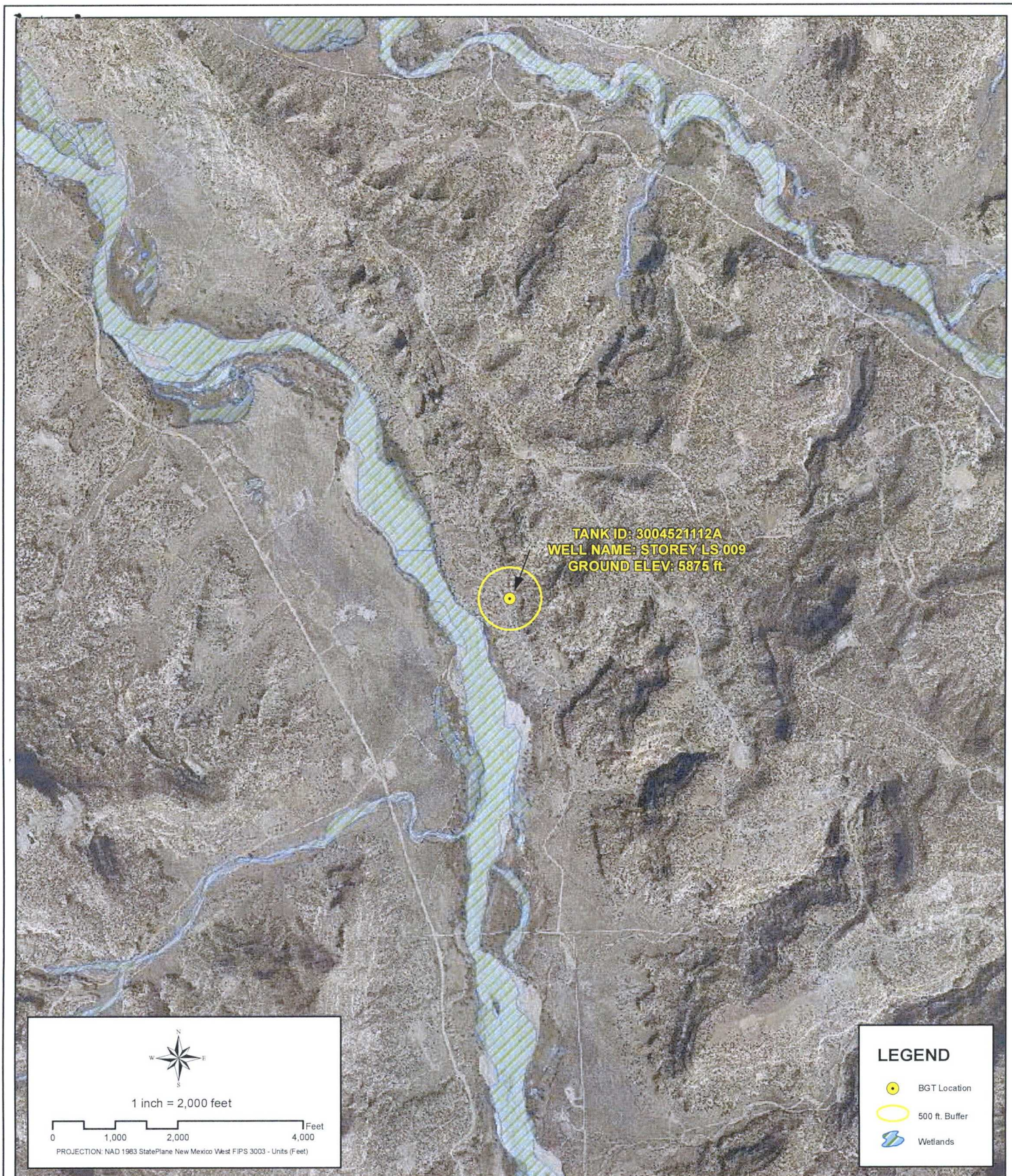
API NUMBER: 3004521112 TANK ID: 3004521112A

SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE

5





File Path: X:\BPPASS\Sector\_7\Sector\_7B\MXDsl\3004521112A.mxd



**PROXIMITY TO WETLANDS**

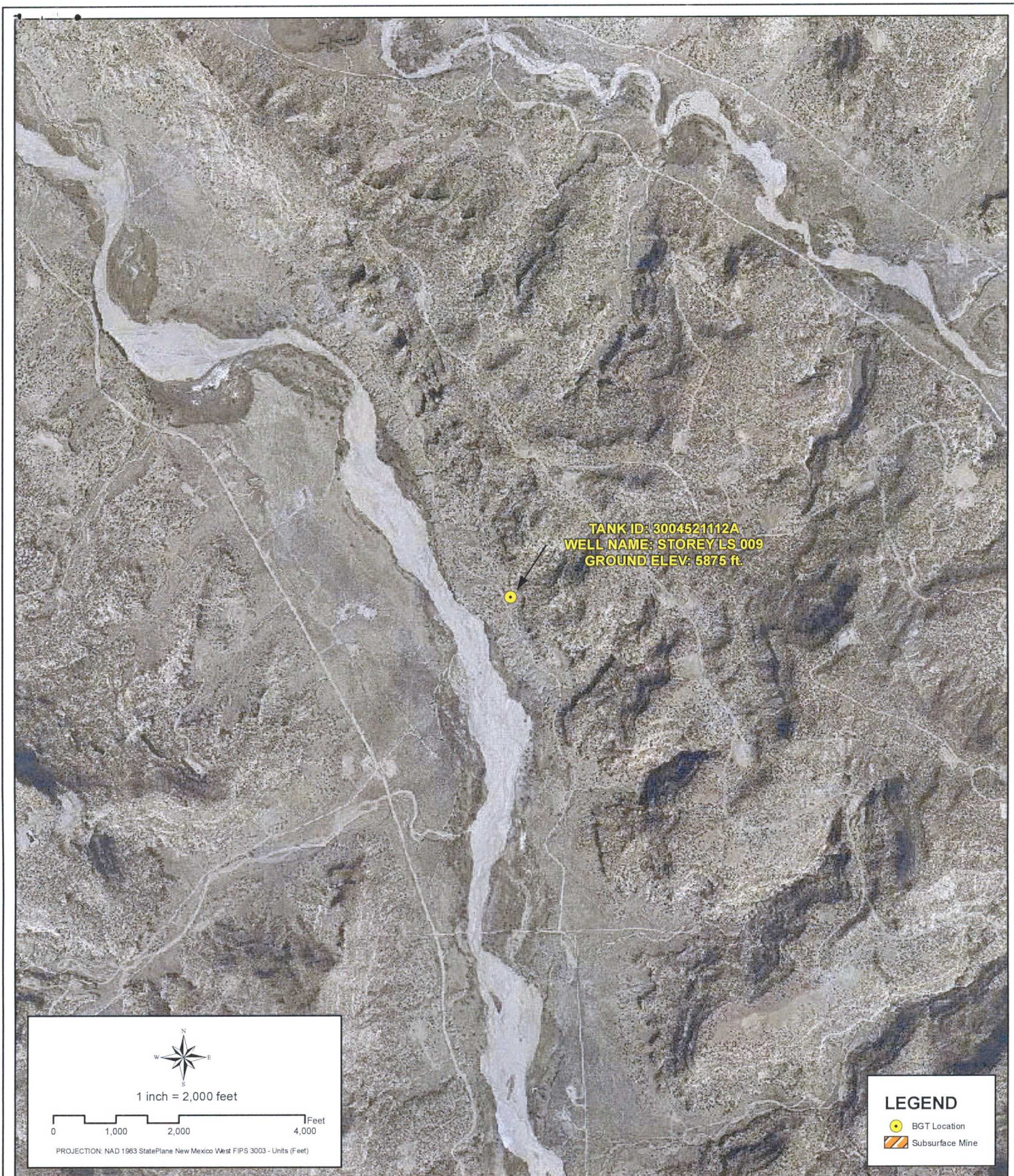
**WELL NAME: STOREY LS 009**

API NUMBER: 3004521112 TANK ID: 3004521112A

SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE  
6





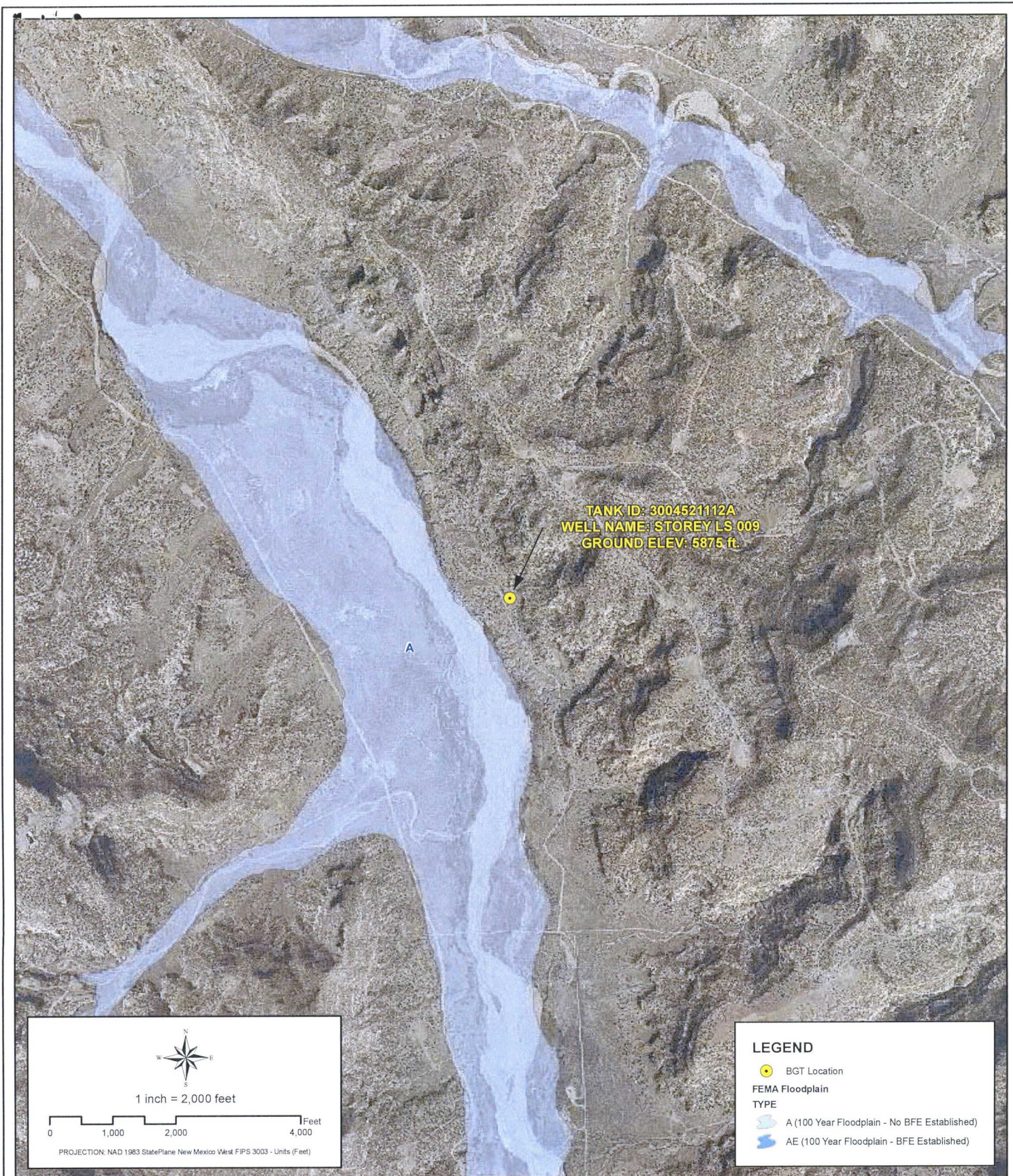
## PROXIMITY TO SUBSURFACE MINES

**WELL NAME: STOREY LS 009**

API NUMBER: 3004521112 TANK ID: 3004521112A  
 SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M.NM23

FIGURE  
**7**





## PROXIMITY TO FLOODPLAIN

**WELL NAME: STOREY LS 009**

API NUMBER: 3004521112 TANK ID: 3004521112A

SECTION 34, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE

8



# BP AMERICA PRODUCTION COMPANY

## SAN JUAN BASIN, NORTHWEST NEW MEXICO


### BELOW-GRADE TANK CLOSURE PLAN

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, BP will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, BP will request preapproval from the Division District III office of any specific changes and will be included on form C-144. BP shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

#### General Closure Plan

1. BP shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
2. BP shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT 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.
3. Within 60 days of cessation of operations, 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 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)
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 Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
5. Within six months of cessation of operations, BP shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
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 to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table 1 on following page).



| <b>Table 1</b><br><b>Closure Criteria for Soils Beneath Below-Grade Tanks</b>                      |             |                                  |              |
|--|-------------|----------------------------------|--------------|
| Depth below bottom of pit to groundwater less than 10,000 mg/l TDS                                 | Constituent | Method*                          | Limit**      |
| ≤50 feet   | Chloride    | EPA 300.0                        | 600 mg/kg    |
|  | TPH         | EPA SW-846 Method 418.1          | 100 mg/kg    |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |
|  51 feet-100 feet | Chloride    | EPA 300.0                        | 10,000 mg/kg |
|  | TPH         | EPA SW-846 Method 418.1          | 2,500 mg/kg  |
|  | GRO+DRO     | EPA SW-846 Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |
| > 100 feet   | Chloride    | EPA 300.0                        | 20,000 mg/kg |
|  | TPH         | EPA SW-846 Method 418.1          | 2,500 mg/kg  |
|  | GRO+DRO     | EPA SW-846 Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.

\* - Or other test methods approved by the division

\*\* - Numerical limits or natural background level, whichever is greater

7. If any contaminant concentration exceeds those standards set in Table I, BP will acknowledge NMOCD's position to require additional delineation upon review of the results. BP will not proceed with any further closure activities until approval is first granted by NMOCD.
8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then BP shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
9. 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 Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) of Subsection H of 19.15.17.13 NMAC.
10. BP may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOCD's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. BP will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOCD for its approval.
11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.



12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.
13. 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.
14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.
17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of BP subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, BP shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
19. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. necessary attachments to document all closure activities
  - b. sampling results
  - c. information required by 19.15.17 NMAC
  - d. details on back-filling, capping and covering, where applicable.
20. 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.