#### District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W Grand Ave., Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM, 87410

District IV

### State of New Mexico **Energy Minerals and Natural Resources**

Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505

July 21, 2008

Form C-144

For temporary pits, closed-loop sytems, 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 1220 S. St Francis Dr, Santa Fe, NM 87505 Pit, Closed-Loop System, Below-Grade Tank, or ROVD JUL 25'08 Proposed Alternative Method Permit or Closure Plan Application; ONES, DIV. Type of action: X Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method : 3 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, 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 hability 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: ConocoPhillips Company OGRID#: 217817 Address: PO Box 4289, Farmington, NM 87499 Facility or well name: San Juan 32-8 Unit 221A API Number: 30-045-32406 OCD Permit Number: U/L or Qtr/Qtr: E(SWNW) Section: Township: 31N Range: County: San Juan Center of Proposed Design: Latitude: 36.9129800' N 107.6865100' W Longitude: NAD: Surface Owner: Federal Private Tribal Trust or Indian Allotment X Pit: Subsection F or G of 19.15.17.11 NMAC Drilling X Workover Temporary: Permanent Emergency Cavitation P&A Thickness 20 mil X LLDPE HDPE PVC Other X Lined Unlined Liner type: X String-Reinforced X Welded X Liner Seams: Factory Other Volume: 7000 bbl Dimensions L 120' x W 55' 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 activities which require prior approval of a permit or notice of intent) Above Ground Steel Tanks Haul-off Bins LLDPE HDPE PVD Other Liner type: Thickness mil Liner Seams: Welded Factory Other Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume: Type of fluid: Tank Construction material: Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls and liner Visible sidewalls only Other Liner Seams: Welded Factory Other Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6' ', ', ',		
Fencing: Subsection D of 19.15 17.11 NMAC (Applies to permanent pit, temporary pits, and below-grade tanks)		
П		
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, insti-	tution or chur	ch)
Four foot height, four strands of barbed wire evenly spaced between one and four feet		
X Alternate Please specify See Design Plan		
A frictime Treate Specify Dec Design Tun		
7		
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)		
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		
X 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 of the Santa Fe Environmental Bureau office for consi	deration of ap	proval
Exception(s). Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.		
10		
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	I	
source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the	1	
appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau Office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria	1	
does not apply to drying pads or above grade-tanks associated with a closed-loop system.		
	l	
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.	Yes	X No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	_	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other watercourse, lakebed, sinkhole, or playa	∏Yes	X No
lake (measured from the ordinary high-water mark).	□™	<u> </u>
- Topographic map; Visual inspection (certification) of the proposed site		
		_
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial	Yes	X No
application.		
(Applies to temporary, emergency, or cavitation pits and below-grade tanks)	NA	
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image		
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	□ Voc	
· · · · · · · · · · · · · · · · · · ·	Yes	∐No
(Applied to permanent pits)	X NA	
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	l	
Within 500 horizonal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering	Yes	X No
purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.		
	1	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site.	1	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes	X No
adopted pursuant to NMSA 1978, Section 3-27-3, as amended		22.10
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	l	
Within 500 feet of a wetland.	Yes	X No
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site		
Within the area overlying a subsurface mine.	Yes	X No
- Written confirmation or verification or map from the NM EMNRD - Mining and Mineral Division	المار ا	±1,™
Within an unstable area.	l □v <sub>aa</sub>	VING
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	Yes	X No
Society; Topographic map	1	
		V V
Within a 100-year floodplain - FEMA map	Yes	XNo

				Attachment Checklist: Subsection B of 19.15.17.9 NMAC
=				ite, by a check mark in the box, that the documents are attached.
X		=	-	f Paragraph (4) of Subsection B of 19.15.17.9 NMAC
			-	rements of Paragraph (2) of Subsection B of 19 15.17 9
				irements of 19 15.17.10 NMAC
	-	n the appropriate requiremen		
=		nce Plan - based upon the ap	•	
	19.15.17.9 NMAC and 1	19.15 17.13 NMAC	if applicable) - based up	on the appropriate requirements of Subsection C of
Pre	viously Approved Design	(attach copy of design)	API	or Permit
12				10.17.17.0.17.10
Instruc	tions. Each of the following		application. Please indicate	te, by a check mark in the box, that the documents are attached.
=			•	requirements of Paragraph (3) of Subsection B of 19.15.17 9
=		•		upon the appropriate requirements of 19.15.17.10 NMAC
님		n the appropriate requiremen		
닏		nce Plan - based upon the ap	•	
	Closure Plan (Please con NMAC and 19.15 17 13	•	if applicable) - based up	son the appropriate requirements of Subsection C of 19.15 17 9
Pre	viously Approved Design	ı (attach copy of design)	API	
Pre	viously Approved Operat	ting and Maintenance Plan	API	
	Dike Protection and Stru Leak Detection Design - Liner Specifications and	esign Plans - based upon the actural Integrity Design: base based upon the appropriate Compatibility Assessment - Assurance Construction and	ed upon the appropriate r requirements of 19 15.17 based upon the appropriate of the control of	requirements of 19 15.17.11 NMAC
	Nuisance or Hazardous C Emergency Response Pla Oil Field Waste Stream C Monitoring and Inspection Erosion Control Plan	ing Prevention Plan - based Odors, including H2S, Preve an Characterization on Plan	upon the appropriate req ention Plan	of 19.15.17.12 NMAC uirements of 19.15 17.11 NMAC  9.15.17 9 NMAC and 19.15.17.13 NMAC
	Freeboard and Overtoppi Nuisance or Hazardous C Emergency Response Pla Oil Field Waste Stream C Monitoring and Inspection Erosion Control Plan Closure Plan - based upo	ing Prevention Plan - based Odors, including H2S, Preve an Characterization on Plan on the appropriate requireme	upon the appropriate req ention Plan	uirements of 19.15 17.11 NMAC
	Freeboard and Overtoppi Nuisance or Hazardous C Emergency Response Pla Oil Field Waste Stream C Monitoring and Inspection Erosion Control Plan Closure Plan - based upo	ing Prevention Plan - based Odors, including H2S, Preve an Characterization on Plan on the appropriate requireme	upon the appropriate requention Plan ents of Subsection C of 1	puirements of 19.15 17.11 NMAC 9.15.17 9 NMAC and 19.15.17.13 NMAC
14 Propo	Freeboard and Overtoppi Nuisance or Hazardous C Emergency Response Pla Oil Field Waste Stream C Monitoring and Inspection Erosion Control Plan Closure Plan - based upo seed Closure: 19.15.17.1 Stions: Please complete the	ing Prevention Plan - based Odors, including H2S, Prevention Plan Characterization on Plan on the appropriate requirements 3 NMAC	ents of Subsection C of 1strough 18, in regards to the	puirements of 19.15 17.11 NMAC 9.15.17 9 NMAC and 19.15.17.13 NMAC
14 Propo Instruct Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative	ing Prevention Plan - based Odors, including H2S, Prevention Plan Characterization on Plan on the appropriate requirement 3 NMAC applicable boxes, Boxes 14 the part Emergency Cavi	ents of Subsection C of 1strough 18, in regards to the	puirements of 19.15 17.11 NMAC  9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.
14 Propo Instruct Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan Characterization on Plan on the appropriate requirement 3 NMAC applicable boxes, Boxes 14 the prevention of Cavilla	ents of Subsection C of 1strough 18, in regards to the station P&A Popolar	puirements of 19.15 17.11 NMAC  9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.
14 Propo Instruct Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requireme    3 NMAC	ents of Subsection C of 1st arough 18, in regards to the station P&A Poval p systems only)	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.  ermanent Pit Below-grade Tank Closed-loop System
14 Propo Instruct Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requirement of the appropriate requirement of the applicable boxes, Boxes 14 the per Emergency Cavilla Waste Excavation and Remod Waste Removal (Closed-loop On-site Closure Method (on Including Prevention Plan Plan Prevention Plan Plan Prevention Plan Plan Plan Plan Plan Plan Plan Pla	ents of Subsection C of 19  arough 18, in regards to the station P&A Peroval p systems only)  ly for temporary pits and of the systems only.	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.  ermanent Pit Below-grade Tank Closed-loop System
14 Propo Instruct Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requirement of the applicable boxes, Boxes 14 the per Emergency Cavilla Waste Excavation and Remod Waste Removal (Closed-loop On-site Closure Method (on X) In-place Burial	ents of Subsection C of 19  arough 18, in regards to the station P&A Peroval p systems only)  ly for temporary pits and a On-site Trench	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.  ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)
14 Propos Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectio Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requirement of the applicable boxes, Boxes 14 the per Emergency Cavilla Waste Excavation and Remod Waste Removal (Closed-loop On-site Closure Method (on X) In-place Burial	ents of Subsection C of 19  arough 18, in regards to the station P&A Peroval p systems only)  ly for temporary pits and a On-site Trench	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan.  ermanent Pit Below-grade Tank Closed-loop System
14 Propo Instruction Propos	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspection Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requireme on the appropriate requireme of the applicable boxes, Boxes 14 the prevention of the applicable boxes, Boxes 14	ents of Subsection C of 19  entrough 18, in regards to the station P&A Peroval poyal	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)
14 Propo Instruction Type.	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspection Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 titions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requireme on the appropriate requireme of the applicable boxes, Boxes 14 the prevention and Remoral Waste Excavation and Remoral (Closed-loop) On-site Closure Method (on X) In-place Burial Alternative Closure Method wal Closure Plan Checklist	ents of Subsection C of 19  entrough 18, in regards to the station P&A Peroval p systems only) ly for temporary pits and of the power o	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)
14 Propo Instruction Type.  Propos  Waste Please	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspectic Erosion Control Plan Closure Plan - based upo  sed Closure: 19.15.17.1 tions: Please complete the Drilling X Workov Alternative ed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan on the appropriate requireme on the appropriate requireme of the applicable boxes, Boxes 14 the prevention of the applicable boxes, Boxes 14	ents of Subsection C of 19  arough 18, in regards to the station P&A Per	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)
14 Propo Instruct Type. Propos	Freeboard and Overtoppin Nuisance or Hazardous Comergency Response Pla Oil Field Waste Stream Communication Control Plan Closure Plan - based uposed Closure: 19.15.17.1 Street Closure Plan - based Uposed Closure: 19.15.17.1 Street Closure Plan - based Uposed Closure: 19.15.17.1 Street Closure Plan - based Uposed Closure Plan - based Uposed Closure Plan - based Uposed Closure Method.	ing Prevention Plan - based Odors, including H2S, Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan - Characterization on Plan - Characterization on the appropriate requirement of the appropriate requirement of the appropriate requirement of the appropriate Plan Checklist in the box, that the documents is - based upon the appropria	ents of Subsection C of 19  arough 18, in regards to the station P&A Per poval p systems only) ly for temporary pits and of Caceptions must be subsection C of 19  i. (19.15.17 13 NMAC) Insist are attached. the requirements of 19.15	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)
14 Propos Instruction Type. Propos	Freeboard and Overtoppin Nuisance or Hazardous Comergency Response Pla Oil Field Waste Stream Communication Control Plan Closure Plan - based uposed Closure: 19.15.17.1 Street Closure Plan - based uposed Closure: 19.15.17.1 Street Closure Plan - based uposed Closure: 19.15.17.1 Street Closure Plan - based uposed Closure Plan - based uposed Closure Plan - based uposed Closure Method.     Drilling   X   Workov   Alternative   X   X   X   X   X   X   X   X   X	ing Prevention Plan - based Odors, including H2S, Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan - Characterization on Plan - Characterization on the appropriate requirements of the appropriate requirements of the properties of the properties of the prevention of the preventi	ents of Subsection C of 19  arough 18, in regards to the station P&A Per poval p systems only) ly for temporary pits and of Caceptions must be subsection C in the station (Exceptions must be subsections of 19.15.17 13 NMAC) Insections in the appropriate requirements of 19.15 inpon the appropriate required, drilling fluids and described in the station of 19.15 in the subsection of 19.15 in the appropriate requirements of 19.15 in the appropriate requirements of 19.15 in the appropriate requirements of 19.15 in the subsection of 1	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)  structions: Each of the following items must be attached to the closure plan.  5.17.13 NMAC  airements of Subsection F of 19.15.17.13 NMAC rill cuttings)
14 Propos Instruction Type. Proposs	Freeboard and Overtoppi Nuisance or Hazardous O Emergency Response Pla Oil Field Waste Stream O Monitoring and Inspecto Erosion Control Plan Closure Plan - based upo  Sed Closure: 19.15.17.1  Itions: Please complete the Drilling Workov Alternative ed Closure Method.  X  Excavation and Removindicate, by a check mark i Protocols and Procedures Confirmation Sampling I Disposal Facility Name a Soil Backfill and Cover I	ing Prevention Plan - based Odors, including H2S, Prevention Plan - based Odors, including H2S, Prevention Plan - Characterization on Plan - Characterization on Plan - Characterization on the appropriate requirements of the appropriate requirements of the properties of the properties of the prevention of the preventi	ents of Subsection C of 19  arough 18, in regards to the station P&A Per poval p systems only) ly for temporary pits and constructions must be subsection C in the station (Exceptions must be subsections of 19.15.17 13 NMAC) Instance are attached.  atter requirements of 19.15 inpon the appropriate requireds, drilling fluids and drid upon the appropriate requirements of the station of the statio	9.15.17 9 NMAC and 19.15.17.13 NMAC  e proposed closure plan. ermanent Pit Below-grade Tank Closed-loop System  closed-loop systems)  mitted to the Santa Fe Environmental Bureau for consideration)  structions: Each of the following items must be attached to the closure plan.  5.17.13 NMAC  irrements of Subsection F of 19.15.17.13 NMAC  rill cuttings) equirements of Subsection H of 19 15.17.13 NMAC

Form C-144 Oil Conservation Division

16 Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Ha	ul-off Bins Only: (19 15 17 13 D NMAC)				
Instructions. Please identify the facility or facilities for the disposal of liquids, drilling fluids and dril, facilities are required					
•	lity Permit #:	i			
	lity Permit #-				
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future service and  Yes (If yes, please provide the information No					
Required for impacted areas which will not be used for future service and operations:  Soil Backfill and Cover Design Specification - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC					
17  Siting Criteria (Regarding on-site closure methods only: 19.15.17.10 NMAC Instructions Each string criteria requires a demonstration of compliance in the closure plan Recommendations of acceptable source material are provided below. Requests regarding changes to certain string criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15 17.10 NMAC for guidance.					
Ground water is less than 50 feet below the bottom of the buried waste	Yes	X No			
- NM Office of the State Engineer - iWATERS database search; USGS Data obtained from near		<u></u>			
Ground water is between 50 and 100 feet below the bottom of the buried waste	Yes	XNo			
- NM Office of the State Engineer - tWATERS database search; USGS; Data obtained from near	by wells N/A				
Ground water is more than 100 feet below the bottom of the buried waste.	X Yes	No			
- NM Office of the State Engineer - (WATERS database search, USGS, Data obtained from nearly	by wells N/A	_			
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercours (measured from the ordinary high-water mark).	se or lakebed, sınkhole, or playa lake	XNo			
- Topographic map; Visual inspection (certification) of the proposed site					
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the - Visual inspection (certification) of the proposed site; Aerial photo; satellite image	e time of initial application.	X No			
	Yes	XNo			
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five househow watering purposes, or within 1000 horizontal fee of any other fresh water well or spring, in existence a - NM Office of the State Engineer - iWATERS database, Visual inspection (certification) of the p	at the time of the initial application	:			
Within incorporated municipal boundaries or within a defined municipal fresh water well field covere adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	ed under a municipal ordinance Yes	XNo			
<ul> <li>Written confirmation or verification from the municipality; Written approval obtained from the</li> <li>Within 500 feet of a wetland</li> </ul>	Yes	XNo			
- US Fish and Wildlife Wetland Identification map; Topographic map. Visual inspection (certific	<del></del>	AINO			
Within the area overlying a subsurface mine.  - Written confirantion or verification or map from the NM EMNRD-Mining and Mineral Division	Yes	XNo			
Within an unstable area	Yes	XNo			
<ul> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resource Topographic map</li> </ul>	es; USGS; NM Geological Society;				
Within a 100-year floodplain FEMA map	Yes	XNo			
18					
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following indicate, by a check mark in the box, that the documents are attached.	ng items must bee attached to the closure plan. Ple	ase			
X Siting Criteria Compliance Demonstrations - based upon the appropriate requirements	of 19.15.17 10 NMAC				
X Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection	on F of 19.15.17 13 NMAC				
Construction and Design of Burial Trench (if applicable) based upon the appropriate re	equirements of 19.15.17.11 NMAC				
X Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 N	MAC				
Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements	of Subsection F of 19.15.17 13 NMAC				
X Waste Material Sampling Plan - based upon the appropriate requirements of Subsection	on F of 19.15.17 13 NMAC				
X Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cutting	gs or in case on-site closure standards cannot be achi-	eved)			
Soil Cover Design - based upon the appropriate requirements of Subsection H of 19 1:					
X   Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19 15.17 13 NMAC					

19			
Operator Application			
	nformation submitted with this application is true, acc	•	·
Name (Print)	Crystal Tafoya	Title:	Regulatory Technician
Signature	Constal Taloya	Date	7/24/2008
e-mail address	crystal.tafoya@conocophyllips.com	Telephone:	505-326-9837
20			
	Permit Application (including closure plan)	Closure Plan (only)	OCD Conditions (see attachment)
OCD Representative	Signature: Ball		Approval Date: 8-4-08
Title: Engl	ro/spec	OCD Pern	nit Number:
21			
	ired within 60 days of closure completion): Sub		re activities and submitting the closure report. The closure
•	• • • • • • • • • • • • • • • • • • • •		s. Please do not complete this section of the form until an
	is been obtained and the closure activities have been o	-	, , , ,
		Closure	e Completion Date:
Classes Mathada			
Closure Method:	Con est Clause Mathed		Marked DW are Demonstrated to a superior and a
Waste Excavation	<b>—</b>	Alternative Closure	Method Waste Removal (Closed-loop systems only)
If different from	approved plan, please explain		
23			
Closure Report Regardi	ing Waste Removal Closure For Closed-loop System	ns That Utilize Above G	ound Steel Tanks or Haul-off Bins Only:
	itify the facility or facilities for where the liquids, dri	illing fluids and drill cutti	ngs were disposed. Use attachment if more than two facilities
were utilized.		Diamond English	Domest Mouse house
Disposal Facility Nam		·	Permit Number
Disposal Facility Nam			Permit Number
—	system operations and associated activities performed	on or in areas that will he	of be used for future service and opeartions?
	e demonstrate complilane to the items below)		
	d areas which will not be used for future service and a	pperations	
	(Photo Documentation) and Cover Installation		
	oplication Rates and Seeding Technique		
- Re-vegetation / Ip	phreation rates and seeding rectinique		
Classes Barant At	to observe Charlists Instructions Fork of the fall	n	about the development Discovery from the development is
the box, that the docu		towing tiems must be atta	sched to the closure report. Please indicate, by a check mark in
	e Notice (surface owner and division)		
<u> </u>	Notice (required for on-site closure)		
	n-site closures and temporary pits)		
11	ampling Analytical Results (if applicable)		
	Sampling Analytical Results (if applicable)		
=	y Name and Permit Number		
l 📜 '			
	and Cover Installation Application Rates and Seeding Technique		
—	on (Photo Documentation)	I ongression	NAD 1027 1092
On-site Closure	Location: Latitude:	Longitude:	NAD   1927   1983
25	.10		
Operator Closure Cer			
	nformation and attachments submitted with this closu i all applicable closure requirements and conditions s		and complete to the best of my knowledge and belief. I also certify that
ne como compues win	appression crossic requirements und conditions s	рогуна т те иррочей с	room o pratts
Name (Print).		Title:	
Signature		Date.	
- mod odd		Т-1	

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

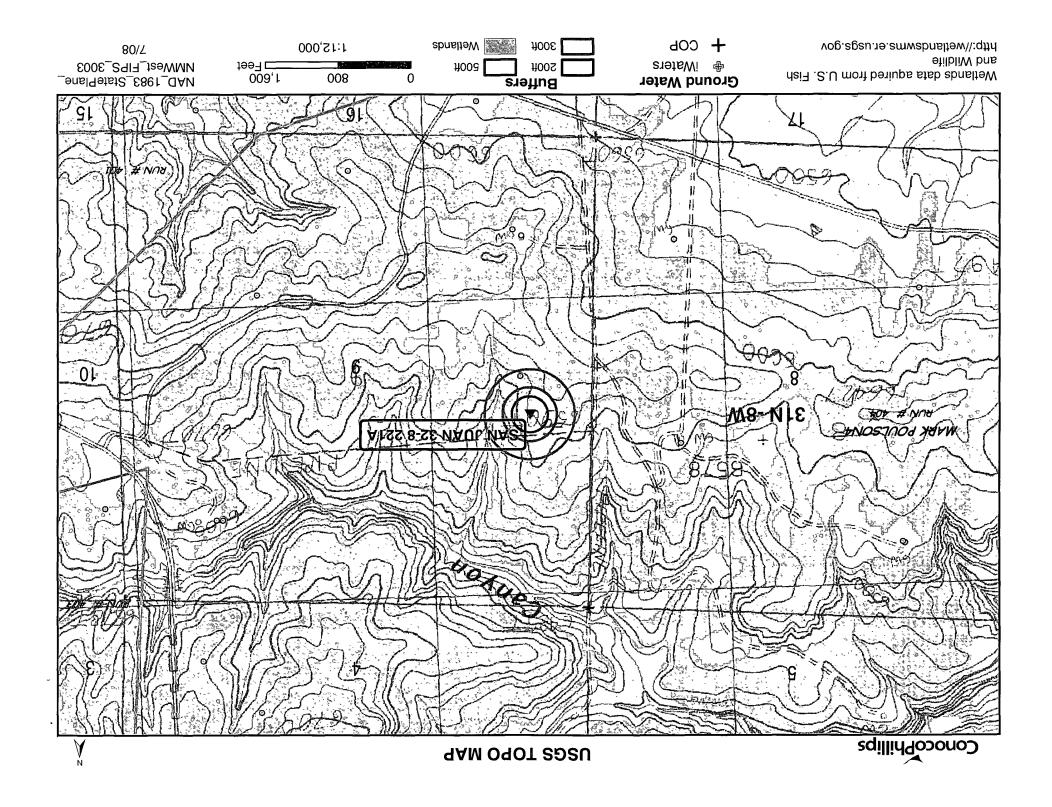
Township: 3	Range: 08W	Sections:			
NAD27 X:	· Y:	Zone:		Search Radius:	,
County:	Basin:			Number:	Suffix:
Owner Name: (First)	(I	Last) All		○ Non-Domestic	ODomestic
POD	/ Surface Data Repo	ort Av. ater Column Repo	- V. C. 14 2 CHR V. ()	) Water Report	
	Clear Form	iWATERS Me	enu ] I	Help	

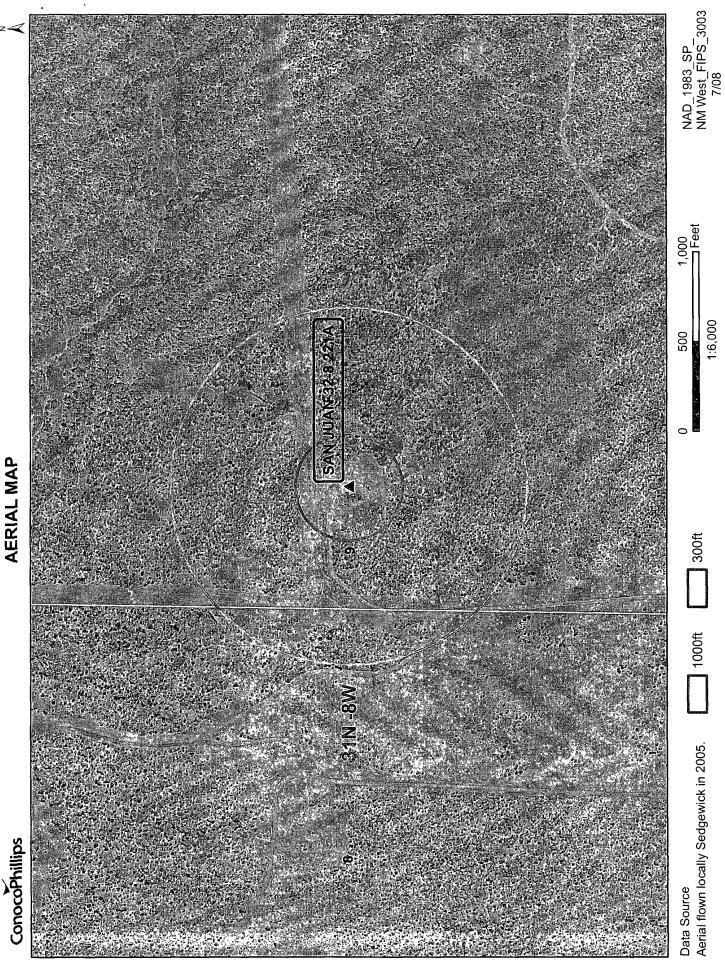
#### WATER COLUMN REPORT 07/24/2008

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

	(quarter	s are	big	gge	st	: to	smallest	=)		Depth	Depth	Wat∈
POD Number	Tws	Rng :	Sec	q	q	<b>q</b>	Zone	x	Y	Well	Water	Colum
SJ 01167	31N	08W	24	4	4	3				465	390	7
SJ 03306	31N	08W	25	1	4	4				600	500	1(
SJ 01822	31N	08W	25	2	2	2				550	500	Ē
SJ 00012	31N	08W	30	2						1021	475	54
SJ 00198	31N	08W	32	3	3	4				2003		

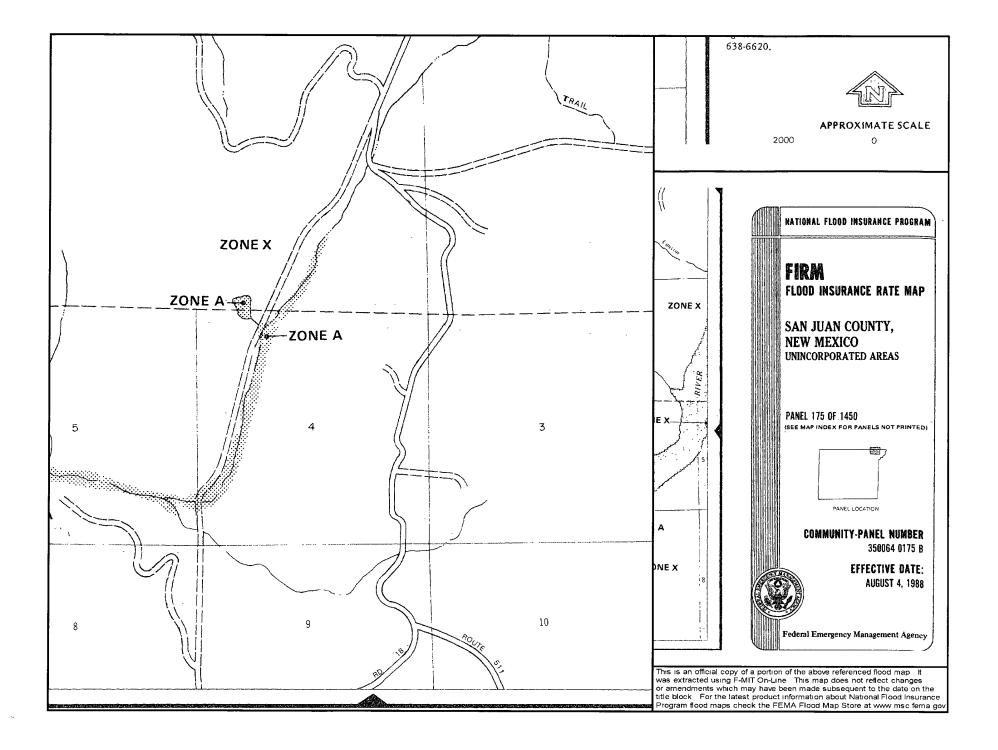
Record Count: 5





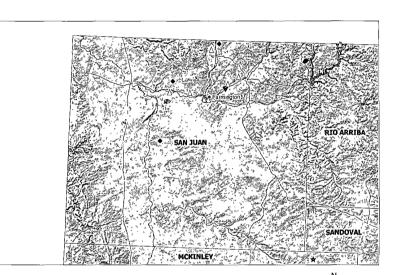
## **Siting Criteria Compliance Demonstrations**

The San Juan 32-8 Unit 221A is not located in an unstable area. The location is not over a mine and is not on the side of a hill. The location of the excavated pit material will not be located within 300' of any continuously flowing watercourse or 200' from any other watercourse.



## San Juan 31-8 Unit 221A Mines, Mills and Quarries Web Map

Mines, Mil	ls & Quarries Commodity Groups	
Δ	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	







### Hydrogeological report for San Juan 32-8 Unit 221A

#### Regional Hydrogeological context:

The San Jose Formation of Eocene age occurs in New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado-New Mexico State line and overlies the Animas Formation in the area generally north of the State line.

The San Jose Formation was deposited in various fluvial-type environments. In general, the unit consists of an interbedded sequence of sandstone, siltstone, and variegated shale. Thickness of the San Jose Formation generally increases from west to east (200 feet in the west and south to almost 2,700 feet in the center of the structural basin). Ground water is associated with alluvial and fluvial sandstone aquifers. Thus, the occurrence of ground water is mainly controlled by the distribution of sandstone in the formation. The distribution of such sandstone is the result of original depositional extent plus any post-depositional modifications, namely erosion and structural deformation. Transmissivity data for San Jose Formation are minimal. Values of 40 and 120 feet squared per day were determined from two aquifer tests (Stone et al, 1983, table 5). The reported or measured discharge from 46 water wells completed in San Jose Formation ranges from 0.15 to 61 gallons per minute and the median is 5 gallons per minute. Most of the wells provide water for livestock and domestic use.

The San Jose Formation is a very suitable unit for recharge from precipitation because soils that form on the unit are sandy and highly permeable and therefore readily adsorb precipitation. However, low annual precipitation, relatively high transpiration and evaporation rates, and deep dissection of the San Jose Formation by the San Juan River and its tributaries all tend to reduce the effective recharge to the unit.

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.

## Tafoya, Crystal

From:

Tafoya, Crystal

Sent:

Thursday, July 24, 2008 10:06 AM

To:

'mark\_kelly@nm.blm.gov'

Subject:

Surface Owner Notification

The following temporary pits will be closed on-site. The new OCD Pit Rule 17 requires the surface owner be notified. Please feel free to contact me at any time if you have any questions. Thank you!

Schumacher #1A San Juan 32-8 Unit 221A

Thanks,

Crystal L. Tafoya Regulatory Technician **ConocoPhillips Company** San Juan Business Unit

Phone: (505) 326-9837

Email: Crystal.Tafoya@conocophillips.com

District I PO Box 1980, Hobbs, NM 88241-1980

District II PO Orawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

Olstrict IV PO Box 2088, Santa Fe, NM 87504-2088 State of New Mexico Energy, Munerals & Natural Resources Department

Revised February 21. 1994
Instructions on back
Submit to Appropriate District Office
V State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

AMENDED REPORT

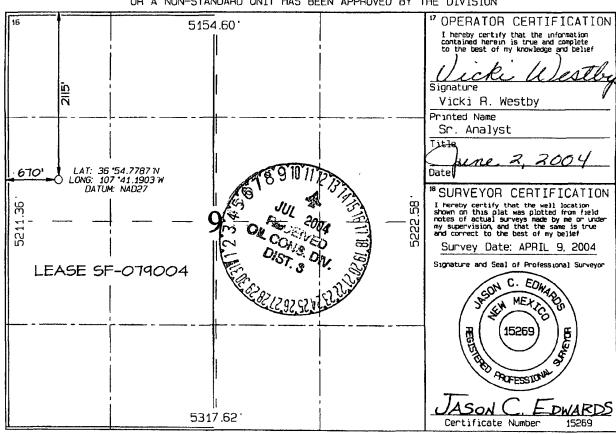
Form C-102

#### WELL LOCATION AND ACREAGE DEDICATION PLAT

3)-045-324	7001 Number Pool Name 7)-045-32406 71629 BASIN FRUITLAND		
Property Code 31330	S	Property Name SAN JUAN 32-8 UNIT	
'OGRID No. 217817	CON	'Operator Name NOCOPHILLIPS COMPANY	*Elevation 6615

<sup>10</sup> Surface Location UL or lot no Feet from the Section Township Let Ion North/South line Feet from the East/West line 9 8W NORTH 670 WEST Ε 31N 2115 SAN JUAN <sup>11</sup>Bottom Hole Location If Different From Surface Ut or lot no Feet from the East/Mest line Doint or Infill 320.0 Acres - (W/2)

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



# ConocoPhillips Company San Juan Basin Pit Design and Construction Plan

In accordance with Rule 19.15.17 the following information describes the design and construction of temporary pits on ConocoPhillips Company (COPC) locations. This is COPC's standard procedure for all temporary pits. A separate plan will be submitted for any temporary pit which does not conform to this plan.

#### General Plan:

- 1. COPC will design and construct a temporary pit to contain liquids and solids and prevent contamination of fresh water and protect public health and environment.
- 2. Prior to constructing the pit, topsoil will be stockpiled in the construction zone for later use in restoration.
- 3. COPC will post a well sign, not less than 12" by 24", on the well site prior to construction of the temporary pit. The sign will list the operator on record as the operator; the location of the well site by unit letter, section, township range; and emergency telephone numbers.
- 4. COPC shall construct all new fences utilizing 48" steel mesh field-fence (hogwire) on the bottom with a single strand of barbed wire on top. T-posts shall be installed every 12 feet and corners shall be anchored utilizing a secondary T-post. Temporary pits will be fenced at all times excluding drilling or workover operations, when the front side of the fence will be temporarily removed for operational purposes.
- 5. COPC shall construct the temporary pit so that the foundation and interior slopes are firm and free of rocks, debris, sharp edges or irregularities to prevent liner failure.
- COPC shall construct the pit so that the slopes are no steeper than two horizontal feet to 1 vertical foot.
- 7. Pit walls will be walked down by a crawler type tractor following construction
- 8. All temporary pits will be lined with a 20-mil, string reinforced, LLDPE liner, complying with EPA SW-846 method 9090A requirements.
- Geotextile will be installed beneath the liner when rocks, debris, sharp edges or irregularities cannot be avoided.
- 10. All liners will be anchored in the bottom of a compacted earth-filled trench at least 18 inches deep.
- 11. COPC will minimize liner seams and orient them up and down, not across a slope. Factory seams will be used whenever possible. COPC will ensure all field seams are welded by qualified personnel. Field seams will be overlapped four to six inches and will be oriented parallel to the line of maximum slope. COPC will minimize the number of field seams in corners and irregularly shaped areas.
- 12. The liner shall be protected from any fluid force or mechanical damage through the use of mud pit slides, or a manifold system.
- 13. The pit shall be protected from run-off by constructing and maintaining diversion ditches around the location or around the perimeter of the pit in some cases.
- 14. The volume of the pit shall not exceed 10 acre-feet, including freeboard.
- 15. Temporary blow pits will be constructed to allow gravity flow to discharge into lined drill pit.
- 16. The lower half of the blow pit (nearest lined pit) will be lined with the same 20 mil liner. The upper half of the blow pit will remain unlined as allowed in Rule 19.15.17.11 F.11.
- 17. COPC will not allow freestanding liquids to remain on the unlined portion of a temporary blow pit.

# ConocoPhillips Company San Juan Basin Maintenance and Operating Plan

In accordance with Rule 19.15.17 the following information describes the operation and maintenance of temporary pits on ConocoPhillips Company (COPC) locations. This is COPC's standard procedure for all temporary pits. A separate plan will be submitted for any temporary pit which does not conform to this plan.

#### General Plan:

- 1. COPC will operate and maintain a temporary pit to contain liquids and solids and prevent contamination of fresh water and protect public health and environment.
- 2. COPC will conserve drilling fluids by transferring liquids to pits ahead of the rigs whenever possible. All other drilling fluids will be disposed at Basin Disposal Inc., permit # NM-01-005.
- 3. COPC will not discharge or store any hazardous waste in any temporary pit.
- 4. If any pit liner's integrity is compromised, or if any penetration of the liner occurs above the liquid's surface, then COPC shall notify the Aztec Division office by phone or email within 48 hours of the discovery and repair the damage or replace the liner.
- 5. If a leak develops below the liquid's level, COPC shall remove all liquids above the damaged liner within 48 hours and repair the damage or replace the liner. COPC shall notify the Aztec Division office by phone or email within 48 hours of the discovery for leaks less than 25 barrels COPC shall notify the Aztec Division office as required pursuant to Subsection B of 19.15.3.116 NMAC shall be reported within twenty-four (24) hours of discovery of leaks greater than 25 barrels. In addition, immediate verbal notification pursuant to Subsection B, Paragraph (1), and Subparagraph (d) of 19.15.3.116 NMAC shall be reported to the division's Environmental Bureau Chief.
- 6. The liner shall be protected from any fluid force or mechanical damage through the use of mud pit slides, or a manifold system.
- 7. The pit shall be protected from run-off by constructing and maintaining diversion ditches around the location or around the perimeter of the pit in some cases.
- 8. COPC shall immediately remove any visible layer of oil from the surface of the temporary pit after cessation of a drilling or workover operation. Oil absorbent booms will be utilized to contain and remove oil from the pit's surface. An oil absorbent boom will stored on-site until closure of pit.
- 9. Only fluids generated during the workover process may be discharged into a temporary pit.
- 10. COPC will maintain the temporary pit free of miscellaneous solid waste or debris.
- 11. During workover operations, COPC will inspect the temporary pit at least once daily to ensure compliance with this plan. Inspections will be logged in the IADC reports. COPC will file this log with the Aztec Division office upon closure of the pit.
- 12. After workover operations, COPC will inspect the temporary pit weekly so long as liquids remain in the temporary pit. A log of the inspections will be stored at COPC's office electronically and will be filed with the Aztec Division office upon closure of the pit.
- 13. COPC shall maintain at least two feet of freeboard for a temporary pit.
- 14. COPC shall remove all free liquids from a temporary pit within 30 days from the date the operator releases the drilling rig.
- 15. COPC shall remove all free liquids from a cavitation pit within 48 hours after completing cavitation. COPC may request additional time to remove liquids from the Aztec Division office if it is not feasible to remove liquids within 48 hours.

# ConocoPhillips Company San Juan Basin Closure Plan

In accordance with Rule 19.15.17.12 NMAC the following information describes the closure requirements of temporary pits on ConocoPhillips Company (COPC) locations. This is COPC's standard procedure for all temporary pits. A separate plan will be submitted for any temporary pit which does not conform to this plan.

All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of pit closure. Closure report will be filed on C-144 and incorporate the following:

- Details on Capping and Covering, where applicable.
- Plot Plan (Pit Diagram)
- Inspection Reports
- Sampling Results
- C-105
- Copy of Deed Notice will be filed with County Clerk

#### **General Plan:**

- 1. All free standing liquids will be removed at the start of the pit closure process from the pit and disposed of in a division—approved facility or recycle, reuse or reclaim the liquids in a manner that the appropriate division district office approves.
- 2. The preferred method of closure for all temporary pits will be on-site burial, assuming that all the criteria listed in sub-section (B) of 19.15.17.13 are met.
- 3. The surface owner shall be notified of COPC's closing of the temporary pit as per the approved closure plan using certified mail, return receipt requested.
- 4. Within 6 months of the Rig Off status occurring COPC will ensure that temporary pits are closed, re-contoured, and reseeded.
- 5. Notice of Closure will be given to the Aztec Division office between 72 hours and one week of closure via email, or verbally. The notification of closure will include the following:
  - i. Operator's name
  - Location by Unit Letter, Section, Township, and Range. Well name and API number.
- 6. Liner of temporary pit shall be removed above "mud level" after stabilization. Removal of liner will consist of manually or mechanically cutting liner at mud level and removing all remaining liner. Care will be taken to remove "All" of the liner i.e., edges of liner entrenched or buried. All excessive liner will be disposed of at a licensed disposal facility.
- 7. Pit contents shall be mixed with non-waste containing, earthen material in order to achieve the solidification process. The solidification process will be accomplished using a combination of natural drying and mechanically mixing. Pit contents will be mixed with non-waste, earthen material to a consistency that is deemed a safe and stable. The mixing ratio shall not exceed 3 parts clean soil to 1 part pit contents.
- 8. A five point composite sample will be taken of the pit using sampling tools and all samples tested per Subsection B of 19.15.17.13(B)(1)(b). In the event that the criteria are not met, all contents will be handled per Subparagraph (a) of Paragraph (1) of Subsection B of 19.15.17.13 i.e., Dig and haul.

Components	Tests Method	Limit (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	2500
GRO/DRO	EPA SW-846 8015M	500
Chlorides	EPA 300.1	1000/\$00

- 9. Upon completion of solidification and testing standards being passed, the pit area will be backfilled with compacted, non-waste containing, earthen material. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater. If standard testing fails COPC will dig and haul all contents pursuant to 19.15.17.13.i.a. After doing such, confirmation sampling will be conducted to ensure a release has not occurred.
- 10. During the stabilization process if the liner is ripped by equipment the Aztec OCD office will be notified within 48 hours and the liner will be repaired if possible. If the liner can not be repaired then all contents will be excavated and removed.
- 11. Dig and Haul Material will be transported to the Envirotech Land Farm located 16 miles south of Bloomfield on Angel Peak Road, CR 7175. Permit # NM010011
- 12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Reshaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.
- 13. Notification will be sent to OCD when the reclaimed area is seeded.
- 14. COPC shall seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (unimpacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.

Туре	Variety or Cultivator	PLS/A
Western wheatgrass	Arriba	3.0
Indian ricegrass	Paloma or Rimrock	3.0
Slender wheatgrass	San Luis	2.0
Crested wheatgrass	Hy-crest	3.0
Bottlebrush Squirreltail	Unknown	2.0
Four-wing Saltbrush	Delar	.25

Species shall be planted in pounds of pure live seed per acre: Present Pure Live Seed (PLS) = Purity X Germination/100 Two lots of seed can be compared on the basis of PLS as follows:

Source No. One (poor quality)
Purity
50 percent
Germination
40 percent
Percent PLS
20 percent
Source No. two (better quality)
Purity
80 percent
Germination
63 percent
Percent PLS
50 percent

5 lb. bulk seed required to make 1 lb. PLS

2 lb. bulk seed required to make 1 lb. PLS

15. The temporary pit will be located with a steel marker, no less than four inches in diameter, cemented in a hole three feet deep in the center of the onsite burial upon the abandonment of all the wells on the pad. The marker will be flush with the ground to allow access of the active well pad and for safety concerns. The marker will include a threaded collar to be used for future abandonment. The top of the marker will contain a welded steel 12" square plate that indicates the onsite burial of the temporary pit. The plate will be easily removable and a four foot tall riser will be threaded into the top of the collar marker and welded around the base with the operator's information at the time of all wells on the pad are abandoned. The operator's information will include the following: Operator Name, Lease Name, Well Name and number, Unit Number, Section, Township, Range and an indicator that the marker is an onsite burial location.