District I       State of New Mexico         District II       State of New Mexico         1301 W. Grand Avenue, Artesia, NM.88210       District III         District III       Oil Conservation Division         1000 Rio Brazos Road, Aztec, NM 87410       VL         District IV       Oil Conservation Division         1220 S. St. Francis Dr. Santa Fee NM 87505       FT 1 29         Santa Fe, NM 87505	Form C-144 July 21, 2008 For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office. For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.
Pit, Closed-Loop System, Below-Grade 7 Proposed Alternative Method Permit or Closure F	
Type of action: Permit of a pit, closed-loop system, below-grade tank, o Closure of a pit, closed-loop system, below-grade tank, Modification to an existing permit Closure plan only submitted for an existing permitted or below-grade tank, or proposed alternative method	r proposed alternative method or proposed alternative method non-permitted pit, closed-loop system,
Instructions: Please submit one application (Form C-144) per individual pit, closed-loop syste Please be advised that approval of this request does not relieve the operator of liability should operations result in	
environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable go	overnmental authority's rules, regulations or ordinances.
Operator: Elm Ridge Exploration OGRID #	149052
	nty: <u>San Juan</u> 1927 🔀 1983
2.  Pit: Subsection F or G of 19.15.17.11 NMAC Temporary: Drilling Workover Permanent Emergency Cavitation P&A Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC OM	her
String-Reinforced	
Liner Seams: Welded Factory Other Volume:bbl	Dimensions: Lx Wx D
3.         Closed-loop System:       Subsection H of 19.15.17.11 NMAC         Type of Operation:       P&A         Drilling a new well       Workover or Drilling (Applies to activities whintent)         Drying Pad       Above Ground Steel Tanks       Haul-off Bins       Other         Lined       Unlined Liner type:       Thickness       mil       LLDPE       HDPE       PVC         Liner Seams:       Welded       Factory       Other	
	verflow shut-off
Alternative Method:	

Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

W.

3

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 <u>4 foot tall hogwire fencing with a rebar railing</u>

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)

Screen 🗌 Netting 🗌 Other

10.

Monthly inspections (If netting or screening is not physically feasible)

Signs: Subsection C of 19.15.17.11 NMAC

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.3.103 NMAC

#### Administrative Approvals and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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. Requests regarding changes to certain siting 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. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

<ul> <li>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.</li> <li>Attached iWATERS database search shows a well, approximately 1.75 miles to the north-east, with a depth to groundwater of 6 feet. This well is at an elevation approximately 250 feet below the BGT, thus suggesting that groundwater is greater than 50 feet from the bottom of the BGT.</li> </ul>	🗋 Yes 🖾 No
<ul> <li>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).0.</li> <li>The nearest watercourse is 924.3 ft. northwest per attached topographic map. The attached visual inspection sheet reflects these findings.</li> </ul>	Yes 🛛 No
<ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>The attached aerial and visual inspection sheet indicates that none of the above locations are within 1000 feet of the well site.</li> </ul>	☐ Yes ⊠ No □ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits)	Yes No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. Attached iWATERS database search and visual inspection sheet indicates no water wells are within 1000 feet of the well site.	Yes 🛛 No
<ul> <li>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.</li> <li>The site is not within incorporated municipal boundaries per the attached topographical map and visual inspection sheet.</li> </ul>	🗋 Yes 🖾 No
<ul> <li>Within 500 feet of a wetland.</li> <li>The USFWS data file, WetlandsData.kmz, dated July 2, 2008 was opened using Google Earth. No wetlands were noted.</li> </ul>	Yes 🛛 No
Within the area overlying a subsurface mine.         -       The attached NM EMNRD web map indicates that the well site is not within an area overlying a subsurface mine.	Yes 🛛 No
<ul> <li>Within an unstable area.</li> <li>The attached topographical map and visual inspection sheet indicates that the well site is not within an unstable area.</li> </ul>	Yes No
<ul> <li>Within a 100-year floodplain.</li> <li>The attached FEMA Map indicates that the well site is not within a 100 year flood plain.</li> </ul>	🗆 Yes 🛛 No

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
<ul> <li>Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> </ul>
Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:
12. <u>Closed-loop Systems Permit Application Attachment Checklist</u> : Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.
Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9     Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC     Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC     Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC     Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number:
Previously Approved Operating and Maintenance Plan API Number:
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
<ul> <li>13. 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. <ul> <li>Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Cirmitological Factors Assessment</li> <li>Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Quality Control/Quality Assurance Construction and Installation Plan</li> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Moitoring and Inspection Plan</li> <li>Erosion Control Plan</li> <li>Closure Plan - based upon the appropriate requirements of 19.15.17.9 NMAC and 19.15.17.13 NMAC</li> </ul></li></ul>
Proposed Closure:       19.15.17.13 NMAC         Instructions:       Please complete the applicable baxes, Baxes 14 through 18, in regards to the proposed closure plan.         Type:       Drilling       Workover       Emergency       Cavitation       P&A       Permanent Pit       Below-grade Tank       Closed-loop System         Alternative       Proposed Closure Method:       Waste Excavation and Removal       Waste Removal (Closed-loop systems only)       Waste Removal (Closed-loop systems only)       In-place Burial       On-site Trench Burial       In-place Burial       On-site Trench Burial       Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)
<ul> <li><sup>15.</sup> 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.</li> <li>☑ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>☑ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC</li> <li>☑ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)</li> <li>☑ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> <li>☑ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC</li> <li>☑ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC</li> </ul>

· ]

16. <u>Waste Removal Closure For Closed-loop Systems That Utilize Above Ground S</u> Instructions: Please indentify the facility or facilities for the disposal of liquids, a		
facilities are required. Disposal Facility Name:	Disposal Facility Parmit Number	
	Disposal Facility Permit Number: Disposal Facility Permit Number:	
Will any of the proposed closed-loop system operations and associated activities oc Yes (If yes, please provide the information below) No		vice and operations?
Required for impacted areas which will not be used for future service and operation Soil Backfill and Cover Design Specifications based upon the appropriate Re-vegetation Plan - based upon the appropriate requirements of Subsection Site Reclamation Plan - based upon the appropriate requirements of Subsection	requirements of Subsection H of 19.15.17.13 NMAC of 19.15.17.13 NMAC	c
<sup>17.</sup> Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the of provided below. Requests regarding changes to certain siting criteria may require considered an exception which must be submitted to the Santa Fe Environmental demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for	e administrative approval from the appropriate distr Bureau office for consideration of approval. Justi	rict office or may be
Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	□ Yes □ No □ NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	Yes No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other sign lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	ificant watercourse or lakebed, sinkhole, or playa	Yes 🗌 No
Within 300 feet from a permanent residence, school, hospital, institution, or church - Visual inspection (certification) of the proposed site; Aerial photo; Satellite		Yes No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less watering purposes, or within 1000 horizontal feet of any other fresh water well or sp - NM Office of the State Engineer - iWATERS database; Visual inspection (d	ring, in existence at the time of initial application.	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approva		Yes No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visua	inspection (certification) of the proposed site	Yes No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining	and Mineral Division	Yes No
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology Society; Topographic map</li> </ul>	& Mineral Resources; USGS; NM Geological	Yes No
Within a 100-year floodplain. - FEMA map		Yes No
<ul> <li>18.</li> <li>On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the by a check mark in the box, that the documents are attached.</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Protocols and Procedures - based upon the appropriate requirements of 19.15.</li> <li>Construction/Design Plan of Temporary Pit (for in-place burial of a drying pa Protocols and Procedures - based upon the appropriate requirements of 19.15.</li> <li>Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Sipposal Facility Name and Permit Number (for liquids, drilling fluids and drive Soil Cover Design - based upon the appropriate requirements of Subsection F</li> </ul>	irements of 19.15.17.10 NMAC Subsection F of 19.15.17.13 NMAC propriate requirements of 19.15.17.11 NMAC d) - based upon the appropriate requirements of 19.1 .17.13 NMAC irements of Subsection F of 19.15.17.13 NMAC Subsection F of 19.15.17.13 NMAC fill cuttings or in case on-site closure standards cannot	15.17.11 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

4

X

\$	
<ul> <li><u>Operator Application Certification</u>:</li> <li>I hereby certify that the information submitted with this application is true, accurate and control of the information submitted with this application.</li> </ul>	mplete to the best of my knowledge and belief.
Name (Print): Ms. Amy Mackey Title:	Administrative Manager
Signature: Date:	1-19-09
E-mail address: amackey1@elmridge.net Telep	hone:(505)632-3476 Ext. 201
20. OCD Approval: Permit Application (including closure plan) Closure Plan (only)	OCD Conditions (see attachment)
OCD Representative Signature: July S	Approval Date: DI FEB 18
Title: OCD Pe	rmit Number: <u>PA</u>
<sup>21.</sup> Closure Report (required within 60 days of closure completion): Subsection K of 19.15 Instructions: Operators are required to obtain an approved closure plan prior to implement The closure report is required to be submitted to the division within 60 days of the complet section of the form until an approved closure plan has been obtained and the closure action	enting any closure activities and submitting the closure report. tion of the closure activities. Please do not complete this vities have been completed.
	sure Completion Date:
22.         Closure Method:         Waste Excavation and Removal         On-Site Closure Method         If different from approved plan, please explain.	re Method 🔲 Waste Removal (Closed-loop systems only)
23. <u>Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Util</u> Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids two facilities were utilized.	and drill cuttings were disposed. Use attachment if more than
	Facility Permit Number:
	Facility Permit Number:
Were the closed-loop system operations and associated activities performed on or in areas th Yes (If yes, please demonstrate compliance to the items below) No	hat will not be used for future service and operations?
Required for impacted areas which will not be used for future service and operations:         Site Reclamation (Photo Documentation)         Soil Backfilling and Cover Installation         Re-vegetation Application Rates and Seeding Technique	
<ul> <li>24.</li> <li>Closure Report Attachment Checklist: Instructions: Each of the following items must items mark in the box, that the documents are attached.</li> <li>Proof of Closure Notice (surface owner and division)</li> <li>Proof of Deed Notice (required for on-site closure)</li> <li>Plot Plan (for on-site closures and temporary pits)</li> <li>Confirmation Sampling Analytical Results (if applicable)</li> <li>Waste Material Sampling Analytical Results (required for on-site closure)</li> <li>Disposal Facility Name and Permit Number</li> <li>Soil Backfilling and Cover Installation</li> <li>Re-vegetation Application Rates and Seeding Technique</li> <li>Site Reclamation (Photo Documentation)</li> </ul>	
On-site Closure Location: Latitude Longitude	NAD: 1927 1983
<ul> <li>25.</li> <li>Operator Closure Certification:</li> <li>I hereby certify that the information and attachments submitted with this closure report is trubelief. I also certify that the closure complies with all applicable closure requirements and complete the closure requirements and closu</li></ul>	conditions specified in the approved closure plan.
Name (Print): Title	:
Signature: Date	:
e-mail address: Tele	phone:

8

ĭ

New Mexico Office of the State Engineer

New Mexico	Office	of the Sta	te Engineer
Point o	of Diver	sion Sun	imary

#### Back

				NE 3=SW 4=SE) to smallest)	
POD Number	-	Sec q q q		x y	
SJ 00588 S	29N 13W	23 3 3 1			
Driller Licence:	717 WESTERN	WATER WELL	s		
Driller Name:	TERRY HOOD			Source:	Shallow
Drill Start Date:	08/08/1995		Drill	Finish Date:	08/10/1995
Log File Date:	12/04/1995		PCW Re	ceived Date:	12/04/1995
Pump Type:			Pipe Dis	charge Size:	3
Casing Size:			Esti	mated Yield:	150
Depth Well:	21			Depth Water:	6
Water Bearing St	ratifications:	<b>Top</b> 11	Bottom 21	Descript Sandstor	t <b>ion</b> ne/Gravel/Conglomer
Casing	Perforations:	<b>Top</b> 13	Bottom 21		

http://iwaters.ose.state.nm.us:7001/iWATERS/WellAndSurfaceDispatcher?email\_address... 10/28/2008

-

-

Township: 29N     Range: 13W     Sections: 33       NAD27     X:     Y:     Zone:     Search Radius:
AD27 X: Y: Zone: Search Radius:
Basin: Number: Suffix:
e: (First) (Last) • Non-Domestic • Domestic • All
POD / Surface Data Report Avg Depth to Water Report Water Column Report
Clear Form WATERS Menu Help

POD / SURFACE DATA REPORT 09/11/2008

POD Number

(acre ft per annum) DB File Nbr Use Diversion Owner 
 (quarters are 1=NN 2=NE 3=SN 4=SE)

 (quarters are biggest to smallest X Y are in Neet

 UTM sure in Meters)

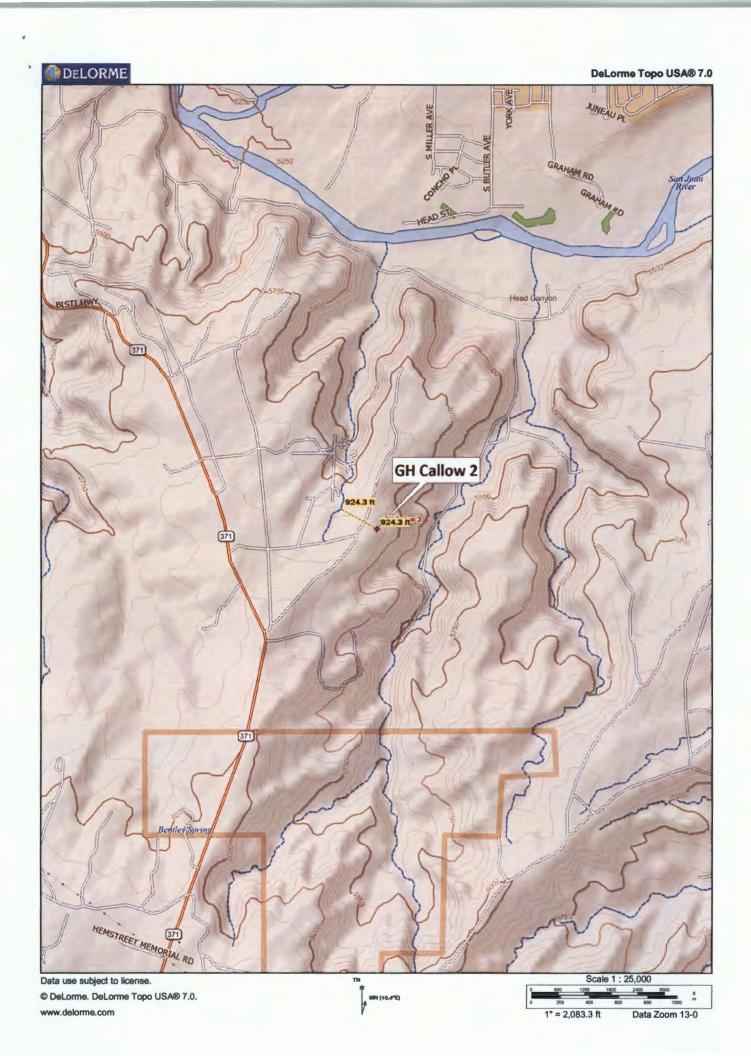
 Source Tws Rng Sec q q q

 Image: Source Tws Rng Sec q q q

Start Finish Data

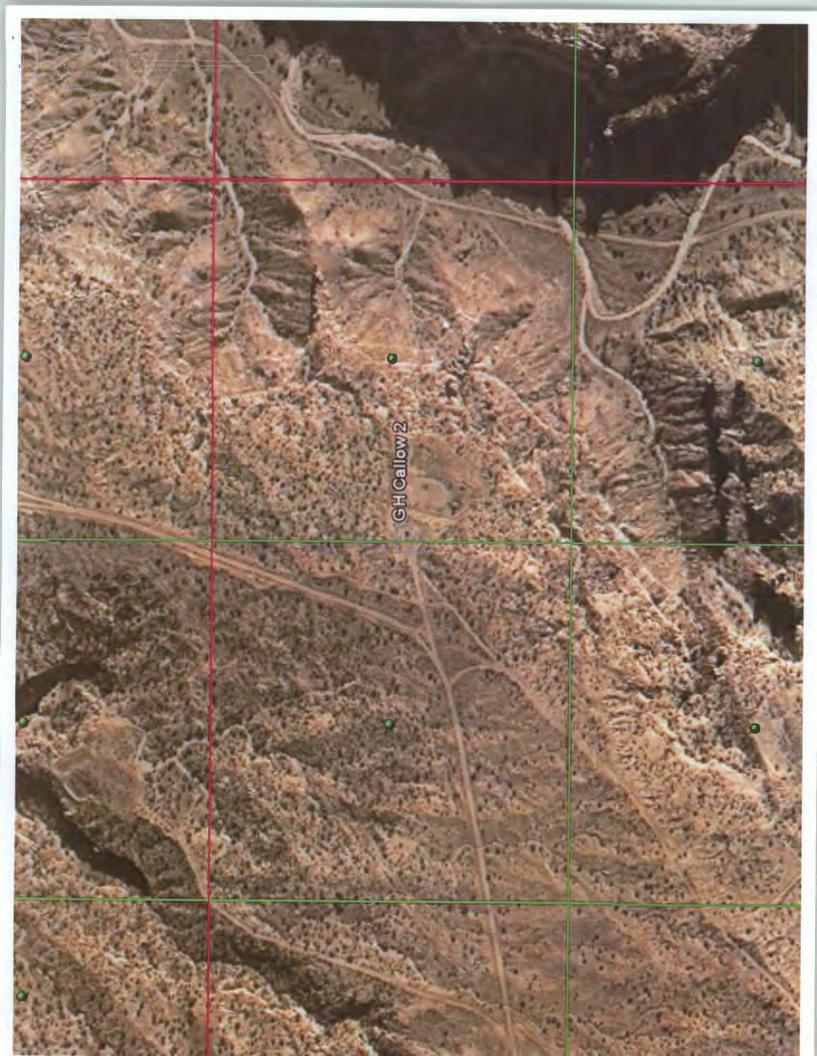
Depth Depth (in feet) Well Water

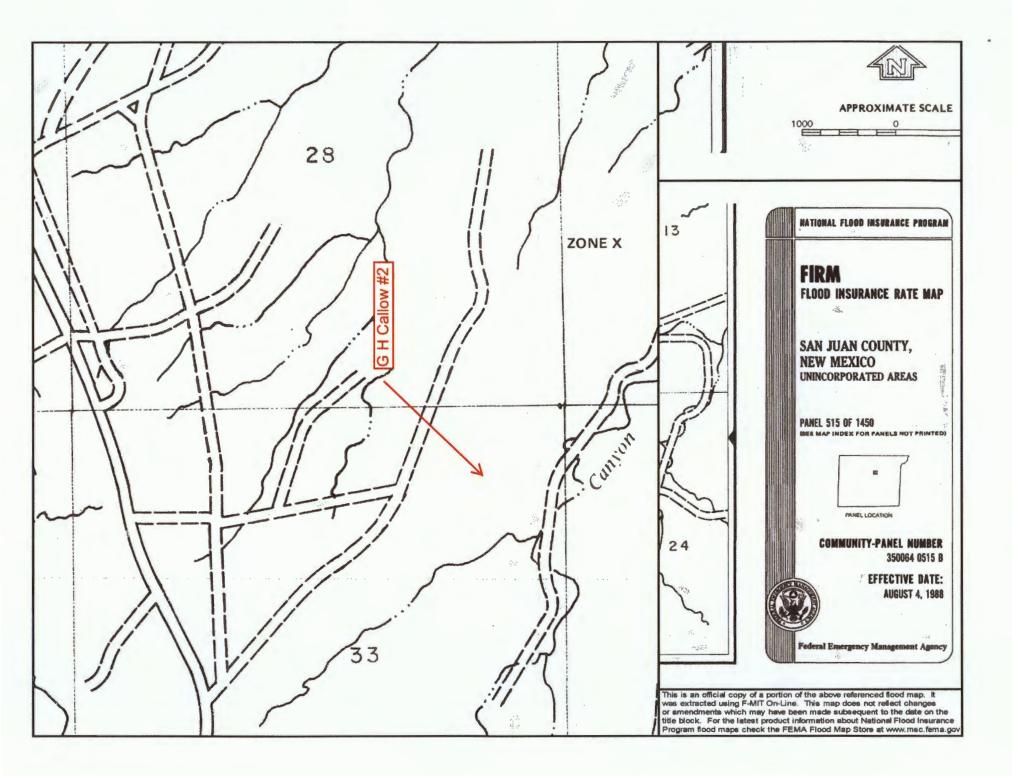
No Records found, try again



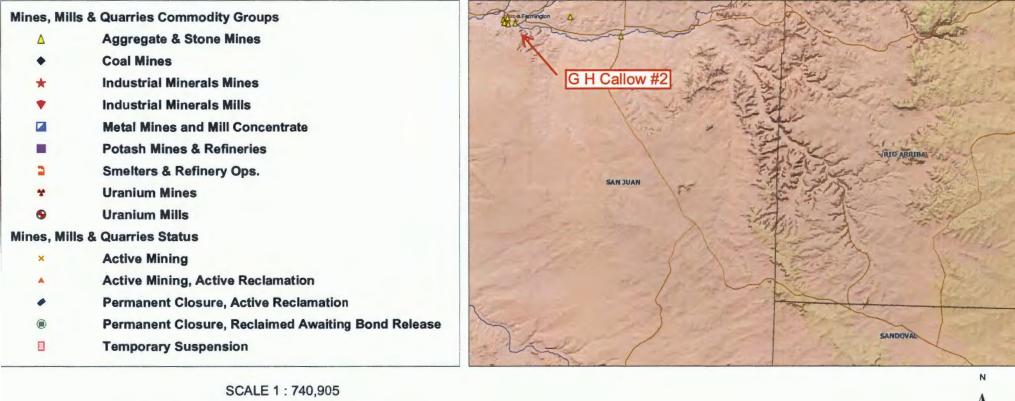
4

¥





# Elm Ridge Exploration Mine Map





Monday, October 20, 2008 4:12 PM

http://www.emnrd.state.nm.us/MMD/MMQonline/MMQonline-PUBLIC-PROD.mwf

-	Elm Ridge Site Inventory Sheet
	Date: 7 31 08 Initials: TKT Time: Started: 9:17 Ended: 9:42
•	Well Name & Number: GH ( allows # 2
	API#: 3004507740
•	Lease #:
	Quarter/Quarter: B Section: 33 Township: 291 Range: 134
•	Lat: 36. 688342° Long: -108.207135° GPS Point ID: Callous2
	Pit Tank #1: Manufacturer: <u><u><u>NJA</u></u></u>
•	Serial #: <u>N/A</u> DOM: <u>N/A</u> Size <u>N/A</u> bbl
	o If N/A - Dimensions: Diameter 12' Height 15'
	Material: Steel Galvanized Fiberglass
	Tank Configuration: Double Wall Single Wall (Burled or Exposed >)
•	Visible Walls: Y N Leak Detection: Y N
•	Contents: Produced Water Condensate Recycled Oil
	Tank Top Covering: Solid/Cone-top Netting (Solid / Fiber)
	Secondary Containment: Yes No No Childen Wire
•	Fencing around berm: Yes No
	Fence Type: Cattle Panel Field Fence Barbwire
•	Pit Tank #2: Manufacturer:
•	Serial #: DOM: Sizebbl
	<ul> <li>If N/A – Dimensions: Diameter Height</li> </ul>
•	Material: Steel Galvanized Fiberglass
•	
•	Material: Steel Galvanized Fiberglass
	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall       Single Wall       (Burled or Exposed)
•	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall        Single Wall      <(Burled or Exposed)         Visible Walls: Y N       Leak Detection: Y N
•	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall        Single Wall      <(Burled or Exposed)
•	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall       Single Wall      (Burled or Exposed)         Visible Walls:       YN       Leak Detection:       YN         Contents:       Produced WaterCondensateRecycled Oli       Tank Top Covering:       Solid/Cone-topNetting(SolidFiber)
•••••	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall        Single Wall          Tank Configuration: Double Wall        Single Wall          Visible Walls: Y N       Leak Detection: Y N       N         Contents: Produced Water       Condensate       Recycled Oli         Tank Top Covering: Solid/Cone-top       Netting       (Solid
•	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall        Single Wall          Tank Configuration: Double Wall        Single Wall          Visible Walls: Y N       Leak Detection: Y N       N         Contents: Produced Water       Condensate       Recycled Oli         Tank Top Covering: Solid/Cone-top       Netting       (Solid
• • •	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall       Single Wall       (Burled_ or Exposed_)         Visible Walls:       YN       Leak Detection:       YN         Contents:       Produced WaterCondensateRecycled Oli         Tank Top Covering:       Solid/Cone-topNetting(SolidFiber)         Secondary Containment:       YesNo
• • • •	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall       Single Wall       (Burled_ or Exposed_)         Visible Walls:       Y       N       Leak Detection:       Y       N         Contents:       Produced Water       Condensate       Recycled Oli       Tank Top Covering: Solid/Cone-top       Netting       (Solid       Fiber         Secondary Containment:       Yes       No       Fencing around berm:       Yes       No         o       Fence Type:       Cattle Panel       Field Fence       Barbwire
• • • •	Material:       Steel       Galvanized       Fiberglass         Tank Configuration: Double Wall       Single Wall       (Burled_ or Exposed_)         Visible Walls:       YN       Leak Detection:       YN         Visible Walls:       YN       Leak Detection:       YN         Contents:       Produced Water       Condensate       Recycled Oli         Tank Top Covering:       Solid/Cone-top       Netting       (Solid
• • • •	Material:       Steel Galvanized Fiberglass

Ŧ	250° 39	Sep 1				
		91 91	8.57	50,		
				N.	FJ	
Schematic Key: Separator	SEP	Artificiał Lift	AL	Condense	te Tank	COND
	COM	Neter Run Well Head		Water Tar	ik (	WATER
<ul> <li>From wellhead</li> <li>Wash</li> <li>From below-grain</li> </ul>	to any cont	inuous flowing	or significant 995	/		

## **BELOW GRADE TANK (BGT) CLOSURE PLAN**

SITE NAME:

G H CALLOW #2 UNIT LETTER B, SECTION 33, TOWNSHIP 29N, RANGE 13W SAN JUAN COUNTY, NEW MEXICO LATITUDE 36.688342 LONGITUDE -108.207135

**SUBMITTED TO:** 

MR. WAYNE PRICE New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 (505) 476-3490

**SUBMITTED BY:** 

MS. AMY MACKEY ELM RIDGE EXPLORATION P.O. BOX 156 BLOOMFIELD, NEW MEXICO 87413 (505) 632-3476 EXT. 201

**JANUARY 2009** 

#### BELOW GRADE TANK (BGT) CLOSURE PLAN ELM RIDGE EXPLORATION G H CALLOW #2 SAN JUAN COUNTY, NEW MEXICO

٠

1

,

#### TABLE OF CONTENTS

INTRODUCTION	. 1
SCOPE OF CLOSURE ACTIVITIES	. 1
REPORTING.	. 3

#### INTRODUCTION

Elm Ridge Exploration would like to submit a closure plan for the below grade tank (BGT) at the G H Callow #2 well site located in the SW ¼ NW 1/4 of Section 33, Township 29N, Range 13W, San Juan County, New Mexico. This closure plan has been prepared in conformance with the closure requirements of 19.15.17.13 NMAC.

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

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

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

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

- 7) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will remove all liquids, and/or sludge, if applicable, prior to closure. Material will be disposed of at Envirotech's Landfarm #2, Permit # NM-01-0011, TNT Environmental Inc. Landfarm, Permit # NM-01-0008, Industrial Ecosystems Inc. (IEI) Landfarm, Permit # NM-01-0010B or Basin Disposal, Permit # NM-01-0005, depending on the consistence of the material removed, as in accordance with 19.15.17.13 Subsection E Paragraph (1) NMAC.
- 8) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will remove all on-site equipment associated with this BGT that is no longer required for some other purpose, as in accordance with 19.15.17.13 Subsection E Paragraphs (3) NMAC.
- 9) If applicable, any liners or leak detection systems removed from a BGT closure will be cleaned off and disposed of at San Juan County Regional Landfill in accordance with Subparagraph (m) of Paragraph (1) of Subsection D of 19.15.9.712 NMAC.
- 10) Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will obtain prior approval from the OCD to dispose, recycle, reuse, or reclaim the BGT. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will provide the OCD with documentation concerning the final disposition of the BGT with the closure report.
- 11) Once the BGT is removed a five (5) point composite sample will be collected from directly below the tank or below the leak detection system if present. Grab samples will be collected from any area that are wet, discolored, or showing other evidence of a release. All samples being collected will be analyzed for benzene and total BTEX via USEPA Method 8021B, TPH via USEPA Method 418.1, and chlorides via USEPA 300.1, as in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
- 12) Depending on soil sample results the area will be either backfilled or the area will be excavated.
  - a. If soil samples do not exceed the regulatory standards of 0.2 mg/kg benzene, 50 mg/kg BTEX, 100 mg/kg TPH, and 250 mg/kg or background concentration of chlorides, as in accordance with 19.15.177.13 Subsection E Paragraph (4) NMAC.
    - i. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, shall submit a Form C-141 with the laboratory results so that the division may review the results to determine if additional delineation is required in accordance with Paragraph (5) of Subsection E of 19.15.17.13 NMAC.
    - ii. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will backfill the excavation or impacted area with non-waste containing, earthen material, in accordance with 19.15.17.13

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

- iii. All areas of the well site that are no longer utilized on a day to day basis for the production of oil and/or gas, Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will substantially restore, recontour, and re-vegetate the areas, in accordance with 19.15.17.13 Subsections G and I NMAC. The operator shall notify the division when it has re-seed and when it has achieved successful re-vegetation. For re-vegetation methods, please see attached re-vegetation plan.
- b. If soil samples exceed the regulatory standards stated above.
  - i. Elm Ridge Exploration will submit a Release Notification by Form C-141 with the appropriate analytical laboratory results to the appropriate division district office, in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
  - ii. In accordance with Paragraph (5) of Subsection E of 19.15.17.13 NMAC, once the operator or the OCD has determined that a release has occurred, Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will comply with rule 19.15.3.116 NMAC and 19.15.1.19 NMAC as appropriate.

#### **REPORTING**

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

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

Respectfully Submitted Elm Ridge Exploration Mac key

Elm Ridg<sup>e</sup> Exploration

#### **Elm Ridge Exploration**

.

#### **Re-Seeding Techniques and Seed Mixture Ratios**

These applied practices by Elm Ridge Exploration will at a minimum comply with the New Mexico Oil Conservation Divisions rule 19.15.17.13, Subsection I NMAC Elm Ridge Exploration has adopted these re-seeding application techniques, ratios, and mixtures as their standard operating procedures.

- 1. The first growing season after closure of a below grade tank or pit, all areas of the well site not utilized for the production of oil and/or gas on a daily basis will be re-seeded with the specified seed mixture.
- 2. The seed mixture used will be certified with no primary or secondary noxious weeds in seed mixtures. The seed labels from each bag shall be available for inspection while seed is being sown.
- 3. The operator shall accomplish seeding by drilling on the contour whenever practical or by other division-approved methods. The operator shall obtain vegetative cover that equals 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
- 4. Hand seeding with hydro-mulch, excelsior netting, or mulch with netting is required on the cut/fill slopes. Mulch will be spread at a rate of 2,000-3,000 pounds per acre.
- 5. Compacted areas determined by visual inspection will be ripped to a depth of 12 inches below ground surface and disked to a depth of six (6) inches before seeding. Seeding shall be done with a disk type drill with two (2) boxes for various seed sizes. The drill rows shall be eight (8) to ten (10) inches apart. Seed shall be planted at no less than one-half (1/2) inch deep or more than one (1) inch deep. The seeder shall be followed with a drag, packer, or roller to ensure uniform coverage of the seed and adequate compaction. Drilling shall be done on the contour where possible, but not up and down the slope.
- 6. Where slopes are too steep for contour drilling a hand seeder shall be used. Seed shall be covered to the depth stated above by whatever means is practical. If the seed is unable to be covered by the means listed above, the prescribed seed mixture amount will be doubled.
- 7. Elm Ridge Exploration shall repeat seeding or planting until it successfully achieves the required vegetative cover of 70% of the native perennial vegetation cover.

8. Upon abandonment of a well site, if the retention of the access road is not considered necessary for the management and multiple uses of the natural resources, or by the surface owner, it will be ripped a minimum of 12 inches in depth. After ripping, water bars will be installed. All ripped surfaces are to be protected from vehicular travel by construction of a dead end ditch and earthen barricade at the entrance to these ripped areas. Re-seeding of areas affected by the ditch and barriers will be re-seeded if necessary.

\*

9. Elm Ridge Exploration, or a contractor acting on behalf of Elm Ridge Exploration, will inform the division once successful re-vegetation has occurred.

#### **Elm Ridge Exploration**

#### San Juan Basin

#### Below Grade Tank Maintenance and Operating Plan

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

#### **GENERAL PLAN:**

• •

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

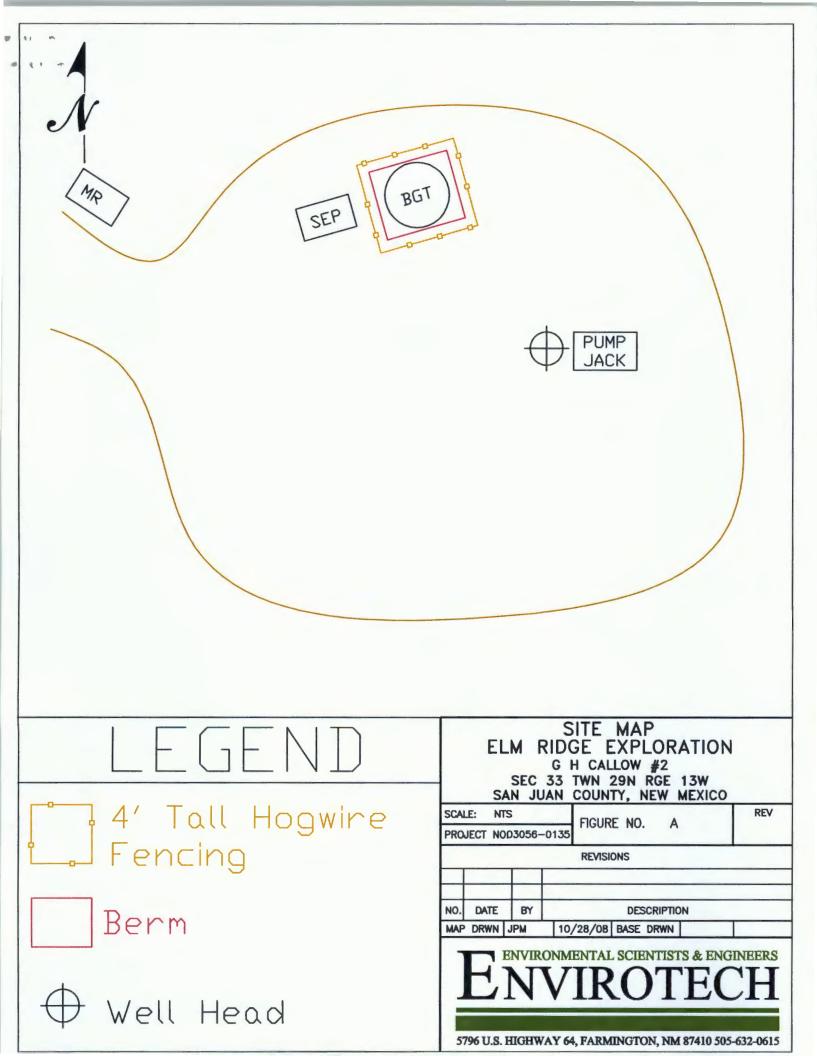
- 7. Elm Ridge Exploration will not discharge into or store any hazardous wastes into the BGT.
- 8. If Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, determines that a BGT has developed a leak below the liquid's surface, then Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, will notify the appropriate division office within 48 hours of discovering the leak. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, shall remove all liquids above the damage or leak line within 48 hours in accordance with Subsection A of 19.15.17.12 NMAC. The damaged tank will then be removed, and closure activities will begin in accordance with the submitted closure plan.
- 9. Elm Ridge Exploration will close any BGT within 60 days of cessation of the BGTs operation per Subsection A of 19.15.17.13 NMAC.
- 10. Elm Ridge Exploration, or a contractor representing Elm Ridge Exploration, will close the BGT within the NMOCD allotted five (5) years, within 60 days of cessation of operation of the BGT or upon failure of integrity, and put into service an above ground storage tank to meet the needs previously fulfilled by the BGT.

Figure A, Site Map

.

11 .

Attachment 1, Monthly BGT Inspection Form



### **Elm Ridge Exploration, LLC**

•• • •

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

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