

## Jones, Brad A., EMNRD

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**From:** Jones, Brad A., EMNRD  
**Sent:** Thursday, July 02, 2009 5:03 PM  
**To:** 'Mark Staley'  
**Subject:** RE: BOPCO - GH COBB  
**Attachments:** 2009-7-2 GH Cobb Federal #1 PP CP.pdf

Mark,

Please see the attached... it is a copy of your closure plan approvals. A hardcopy will be mailed to Mr. Steve Johnson of BOPCO next Monday. In accordance with Paragraph (5) of Subsection I of 19.15.17.13 NMAC, "*The operator shall notify the division when it has seeded or planted and when it successfully achieves re-vegetation.*" This was a requirement left out of your closure plan that must be satisfied. If you have any questions regarding this matter, please do not hesitate to contact me.

Brad

**Brad A. Jones**  
*Environmental Engineer*  
*Environmental Bureau*  
*NM Oil Conservation Division*  
*1220 S. St. Francis Drive*  
*Santa Fe, New Mexico 87505*  
*E-mail: [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us)*  
*Office: (505) 476-3487*  
*Fax: (505) 476-3462*

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**From:** Mark Staley [<mailto:mark@sportenvironmental.com>]  
**Sent:** Thursday, July 02, 2009 3:22 PM  
**To:** Jones, Brad A., EMNRD  
**Cc:** Debi Moore  
**Subject:** BOPCO - GH COBB and JOESPHINE RODKE

Brad,

I was looking at our schedule and wanted to see if we could get verbal approval for the pit closure? We have next week free and would like to start on the excavation process and get some samples into the lab. Would this be possible?



### **MARK E. STALEY**

*Environmental Coordinator*  
Sport Environmental Services, PLLC  
502 North Big Spring Street  
Midland, Texas 79701  
[mark@sportenvironmental.com](mailto:mark@sportenvironmental.com)  
Business: 432.683.1100  
Fax: 888.500.0622



**SPORT ENVIRONMENTAL SERVICES, PLLC**

502 N. Big Spring Street, Midland, Texas 79701  
Business: 432.683.1100 Fax: 888.500.0622

RECEIVED

2009 JUN 18 PM 1 06

June 15, 2009

Mr. Brad Jones  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: **Notice of Closure**  
**BOPCO, L.P.**  
**Josephine Rodke Federal #1**  
**API No. 30-015-05833**  
**Unit Letter G**  
**Section 27, T-20-S, R-31-E**  
**Eddy County, New Mexico**

**Notice of Closure**  
**BOPCO, L.P.**  
**G.H. Cobb Federal #1**  
**API No. 30-015-05829**  
**Unit Letter M**  
**Section 23, T-20-S, R-31-E**  
**Eddy County, New Mexico**

Dear Mr. Jones,

Sport Environmental on behalf of BOPCO, L.P. is providing notice to the NMOCD according to NMAC 19.15.17.13(j) of the above mentioned location that we will be filing for closure of said two permanent pits.

If you have any questions or comments with regard to this matter, please contact me at either my office (432.683.1100) or on my cell (432.553.8555).

Sincerely,

*Debi S. Moore*

Debi S. Moore, M.E., R.E.P.A.  
President

*Enclosure:* Form C-144

cc: BOPCO, L.P.  
Attn: Steve Johnson  
P. O. Box 2760  
Midland, TX 79702



**SPORT ENVIRONMENTAL SERVICES, PLLC**  
502 N. Big Spring Street, Midland, Texas 79701  
Business: 432.683.1100 Fax: 888.500.0622

2009 JUL 2 AM 9 48

June 30, 2009

Mr. Brad Jones  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: **NMOCD Form C-144**  
**BOPCO, L.P.**  
**G. H. Cobb Federal #1**  
**API No. 30-015-05829**  
**Unit Letter M**  
**Section 23, T-20-S, R-31-E**  
**Eddy County, New Mexico**

Dear Mr. Jones,

Enclosed is the Form C-144 and associated documents for the aforementioned site. Per our conversation, we have made the requested changes to the closure plan and associated documents.

If you have any questions or comments with regard to this matter, please contact me at either my office (432.683.1100) or on my cell (432.553.8555).

Sincerely,

Debi S. Moore, M.E., R.E.P.A.  
President

*Enclosure:* Form C-144

cc: BOPCO, L.P.  
Attn: Steve Johnson  
P. O. Box 2760  
Midland, TX 79702

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
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 Tank, or  
Proposed Alternative Method Permit or Closure Plan Application**

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

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.				
Operator: <b>BOPCO, L.P.</b>	OGRID #: <b>001801</b>			
Address: <b>P.O. Box 2760, Midland, Texas 79702</b>				
Facility or well name: <b>G.H. Cobb Federal #1</b>				
API Number: <b>30-015-05829</b>	OCD Permit Number:			
U/L or Qtr/Qtr <b>M</b>	Section <b>23</b>	Township <b>20S</b>	Range <b>31E</b>	County: <b>Eddy</b>
Center of Proposed Design: Latitude <b>N32°33'11.412</b>		Longitude <b>W103°50'44.304</b>		NAD: <input type="checkbox"/> 1927 <input type="checkbox"/> 1983
Surface Owner: <input checked="" type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Private <input type="checkbox"/> Tribal Trust or Indian Allotment				

2.	
<input checked="" type="checkbox"/> <b>Pit:</b> Subsection F or G of 19.15.17.11 NMAC	
Temporary: <input type="checkbox"/> Drilling <input type="checkbox"/> Workover	
<input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Emergency <input type="checkbox"/> Cavitation <input type="checkbox"/> P&A	
<input type="checkbox"/> Lined <input checked="" type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____	
<input type="checkbox"/> String-Reinforced	
Liner Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____	

3.	
<input type="checkbox"/> <b>Closed-loop System:</b> Subsection H of 19.15.17.11 NMAC	
Type of Operation: <input type="checkbox"/> P&A <input type="checkbox"/> Drilling a new well <input type="checkbox"/> Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)	
<input type="checkbox"/> Drying Pad <input type="checkbox"/> Above Ground Steel Tanks <input type="checkbox"/> Haul-off Bins <input type="checkbox"/> Other _____	
<input type="checkbox"/> Lined <input type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____	
Liner Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____	

4.	
<input type="checkbox"/> <b>Below-grade tank:</b> Subsection I of 19.15.17.11 NMAC	
Volume: _____ bbl Type of fluid: _____	
Tank Construction material: _____	
<input type="checkbox"/> Secondary containment with leak detection <input type="checkbox"/> Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	
<input type="checkbox"/> Visible sidewalls and liner <input type="checkbox"/> Visible sidewalls only <input type="checkbox"/> Other _____	
Liner type: Thickness _____ mil <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____	

5.	
<input type="checkbox"/> <b>Alternative Method:</b>	
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 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 \_\_\_\_\_

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
- ☒ Signed in compliance with 19.15.3.103 NMAC

9.

**Administrative Approvals and Exceptions:**

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

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

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

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

11.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

12.

**Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

☐ Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.

**Proposed Closure:** 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☒ Permanent Pit ☐ Below-grade Tank ☐ Closed-loop System

☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal

☐ Waste Removal (Closed-loop systems only)

☐ On-site Closure Method (Only for temporary pits and closed-loop systems)

☐ In-place Burial ☐ On-site Trench Burial

☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- ☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)**Instructions:** Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?☐ Yes (If yes, please provide the information below) ☐ No*Required for impacted areas which will not be used for future service and operations:*☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection 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 siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria 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.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is between 50 and 100 feet below the bottom of the buried waste

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is more than 100 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.

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

☐ Yes ☐ No

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

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

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within the area overlying a subsurface mine.

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

☐ Yes ☐ No

Within an unstable area.

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

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

18.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Steve Johnson

Title: SR, Production ForemanSignature: Steve JohnsonDate: 7/1/09

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

Telephone: (432) 683-2277

20.

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

OCD Representative Signature: Emmanuel EnglerApproval Date: 7/2/09Title: Emmanuel Engler

OCD Permit Number: \_\_\_\_\_

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC

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

☐ Closure Completion Date: \_\_\_\_\_

22.

**Closure Method:**

☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)  
☐ If different from approved plan, please explain.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

*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

24.

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

- ☐ Proof of Closure Notice (surface owner and division)  
☐ Proof of Deed Notice (required for on-site closure)  
☐ Plot Plan (for on-site closures and temporary pits)  
☐ Confirmation Sampling Analytical Results (if applicable)  
☐ Waste Material Sampling Analytical Results (required for on-site closure)  
☐ Disposal Facility Name and Permit Number  
☐ Soil Backfilling and Cover Installation  
☐ Re-vegetation Application Rates and Seeding Technique  
☐ Site Reclamation (Photo Documentation)

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

25.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_

Title: \_\_\_\_\_

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

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

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

Telephone: \_\_\_\_\_

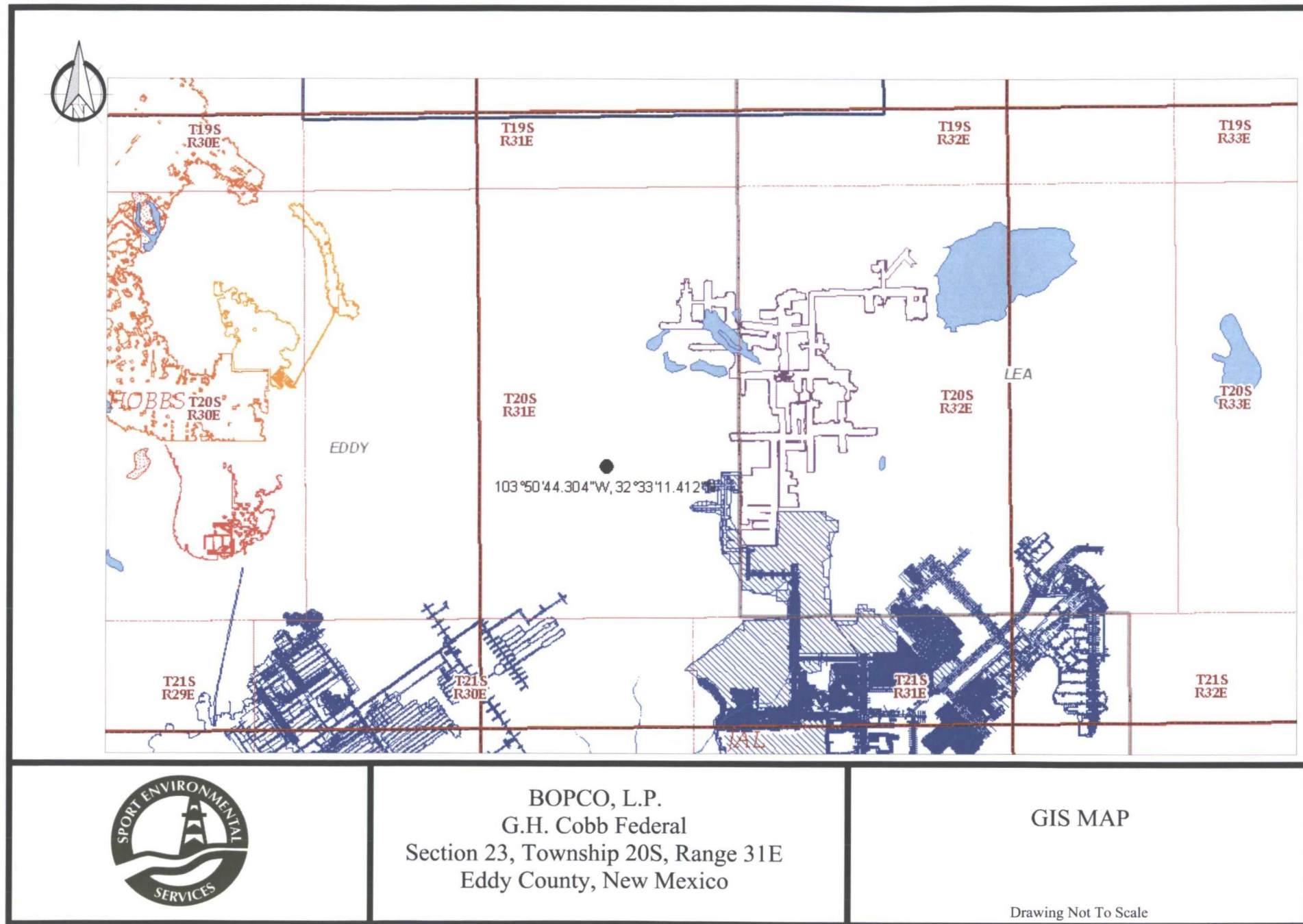


BOPCO, L.P.  
Josephine Rodke Federal #1  
Section 27, T-20-S, R-31-E  
Eddy County, NM

API# 30-015-05833

CLOSURE PLAN

The New Mexico OCD and Bureau of Land Management were both sent notification of closure on June 15, 2009. BOPCO, L.P. will excavate to ten feet below ground surface to the bottom of the pit removing any dried sludge. The pit was unlined so no liner will need to be removed. No free liquids are presently in the pit and there is not any associated equipment in or around the pit that will need to be removed. All excavated dried sludge will be hauled and disposed of at CRI (Controlled Recovery Incorporated - Permit R-9166). BOPCO, L.P. will test the soils beneath the permanent pit to determine whether a release has occurred. BOPCO, L.P. will collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyze for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 100 mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. BOPCO, L.P. will notify the division of its results on form C-141 in accordance with NMAC 19.15.17.13(c) *Closure method for permanent pits*. If the BOPCO or the division determines that a release has occurred, then the BOPCO shall comply with 19.15.29 NMAC and 19.15.30 NMAC, as appropriate. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (3) of Subsection C of 19.15.17.13 NMAC, then the BOPCO, L.P. will backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site. The division-prescribed soil cover, recontouring and re-vegetation requirements will comply with Subsections G, H and I of 19.15.17.13 NMAC per our Site Reclamation Plan. BOPCO, L.P. will commence closure of the site within one week of approval from the NMOCD. It will take BOPCO, L.P. approximately 2 days to excavate to ten feet and one day to sample the excavation. It will take five days to receive the results from the lab. Approximately three days to backfill the excavation and recontour the site with the existing topography. It will take one day to reseed the area. Within 60 days of closure completion, BOPCO, L.P. will submit a closure report on form C-144, with necessary attachments to document all closure activities including sampling results; information required by 19.15.17 NMAC; a plot plan; and details on back-filling, capping and covering, where applicable. In the closure report, BOPCO, L.P. will certify that all information in the report and attachments is correct and that BOPCO, L.P. has complied with all applicable closure requirements and conditions specified in the approved closure plan.



BOPCO, L.P.  
G.H. Cobb Federal  
Section 23, Township 20S, Range 31E  
Eddy County, New Mexico

GIS MAP

Drawing Not To Scale



The Oilfield Waste Disposal Experts. <sup>SM</sup>



**The Smarter, Safer Solution  
to Your Oil and Gas Related  
Waste Management Needs.**

**Disposal Facility Name**

**Controlled Recovery, Inc**

**Permit Number**

**R-9166**





Source: Geologic Atlas of Texas, Hobbs Sheet  
(Barnes, V., and Groat, C. G., Bureau of Economic Geology, 1976)

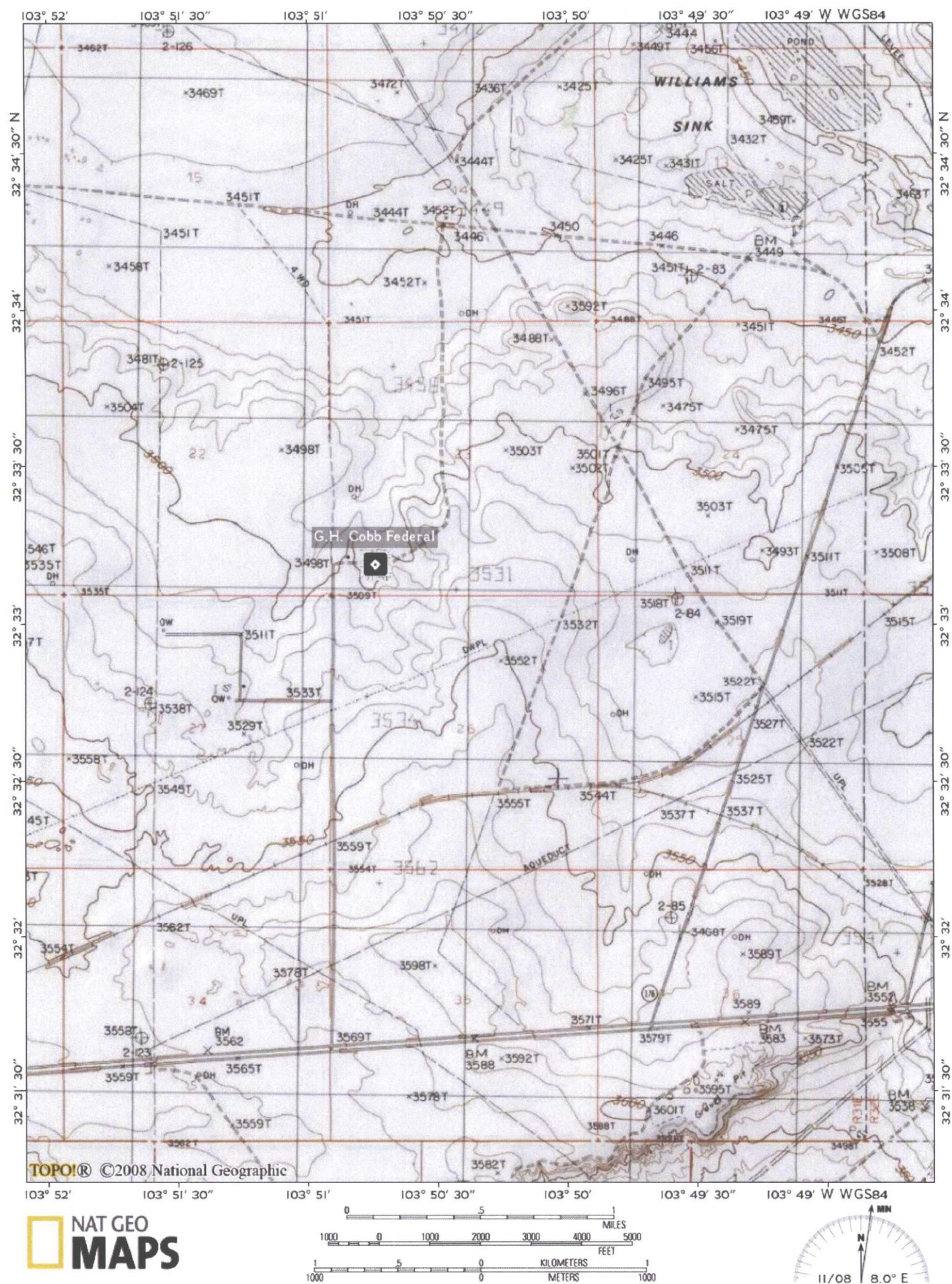


BEPCO, L. P.

G. H. Cobb Federal #1 & Josephine Rodke Federal #2  
Township 20 South, Range 31 East (Sections 23 & 27)  
Eddy County, New Mexico

FIGURE 1  
GEOLOGIC MAP









BOPCO, L.P.  
G.H. Cobb Federal #1  
Section 23, Township 20S, Range 31E  
Eddy County, New Mexico

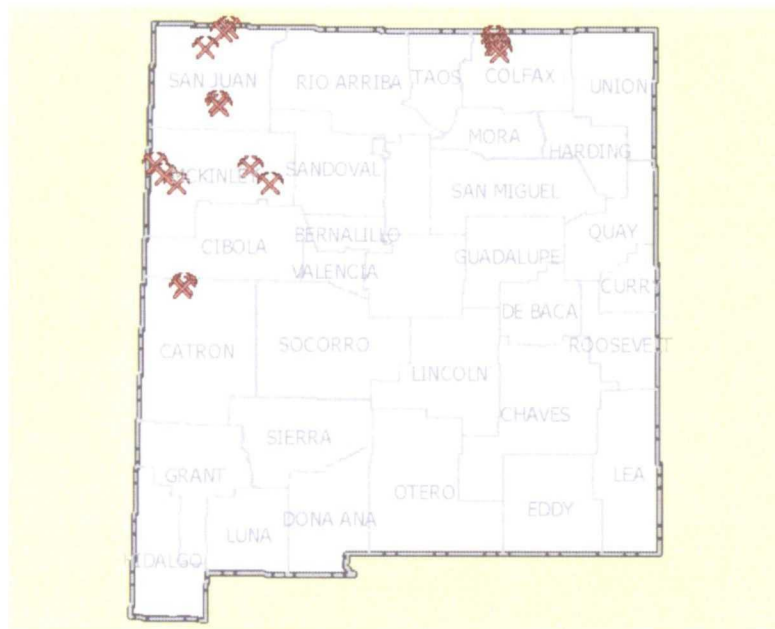
Permanent Pit  
Location  
32.553322° , -103.848299°



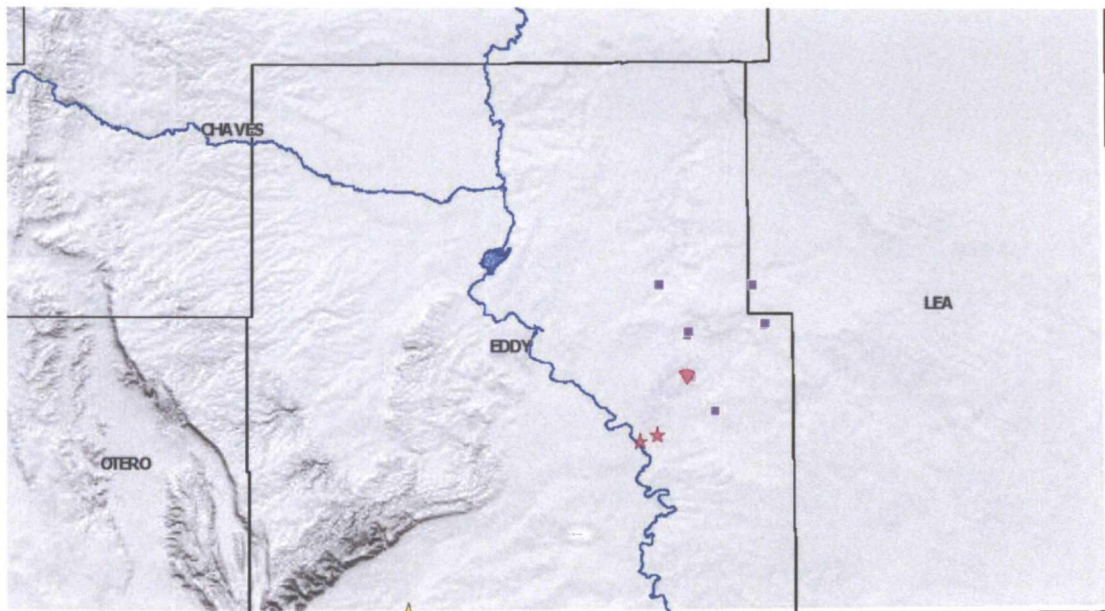
NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

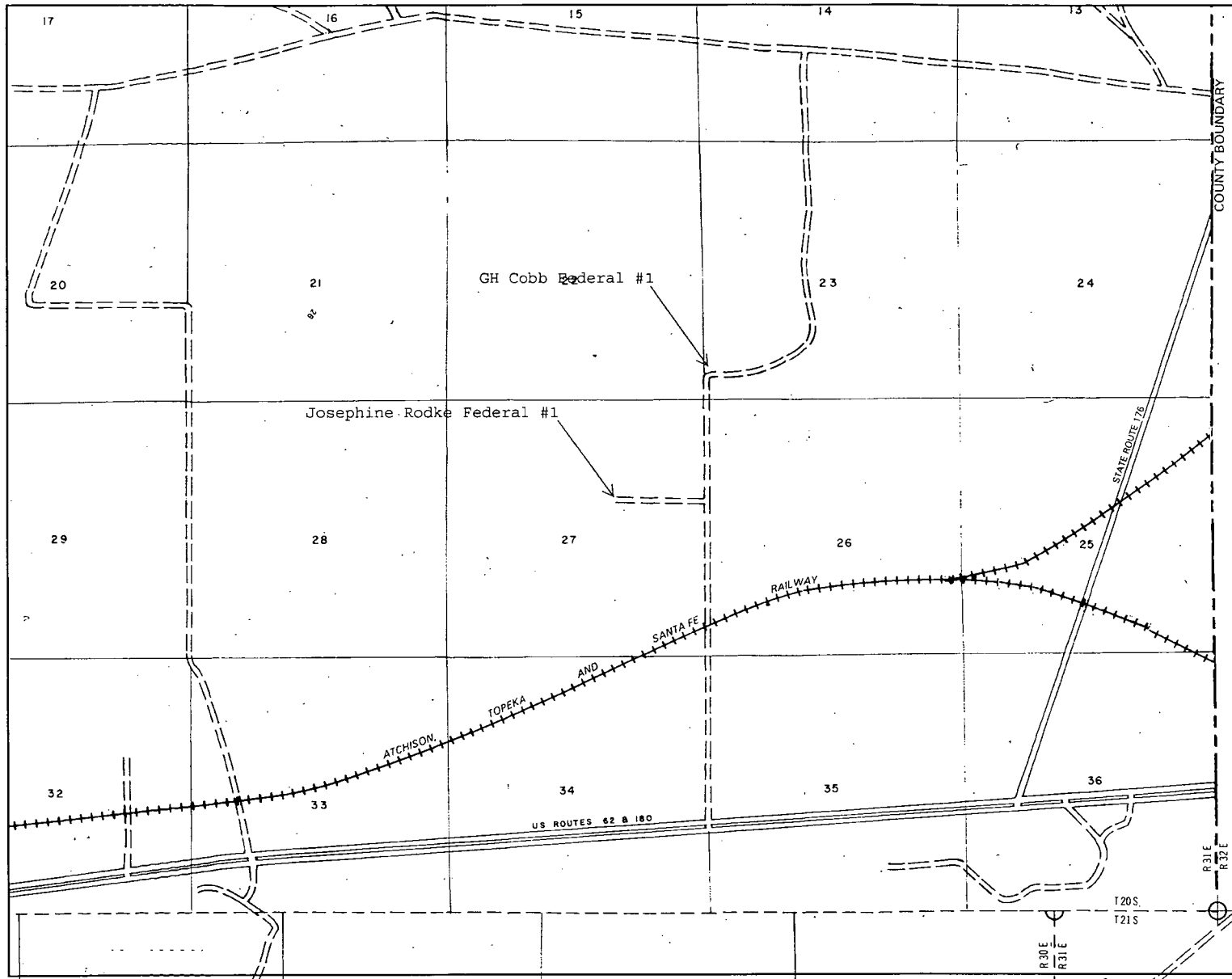
## MINING AND MINERALS DIVISION

### Coal Mine Locations

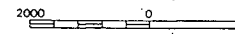


### Mines, Mills and Quarries Locations





APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

**FIRM**  
FLOOD INSURANCE RATE MAP

EDDY COUNTY,  
NEW MEXICO  
UNINCORPORATED AREAS

PANEL 500 OF 1125  
(SEE MAP INDEX FOR PANELS NOT PRINTED)



PANEL LOCATION

COMMUNITY-PANEL NUMBER  
330120 0500 8

EFFECTIVE DATE:  
FEBRUARY 6, 1991



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)





## SITE RECLAMATION PLAN

### RECLAMATION OBJECTIVE

(This reclamation objective is in accordance with Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development: Chapter 6 – Reclamation and Abandonment)

Oil and gas development is one of many uses of the public lands and resources. While development may have a short- or long-term effect on the land, successful reclamation can insure the effect is not permanent. At final abandonment, well locations, production facilities, and access roads must undergo “final” reclamation so that the character and productivity of the land and water are restored.

The long-term objective of final reclamation is to set the course for eventual ecosystem restoration, including the restoration of the natural vegetation community, hydrology, and wildlife habitats. In most cases, this means returning the land to a condition approximating or equal to that which existed prior to the disturbance.

The reclamation process involves restoring the original landform or creating a landform that approximates and blends in with the surrounding landform. It also involves revegetating disturbed areas to native species, controlling erosion, controlling invasive non-native plants and noxious weeds, and monitoring results.

Reclamation generally can be judged successful when a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community is established on the site, with a plant density sufficient to control erosion and non-native plant invasion and to re-establish wildlife habitat or forage production. Erosion control is generally sufficient when adequate groundcover is reestablished, water naturally infiltrates into the soil, and gully, headcutting, slumping, and deep or excessive rilling is not observed. The site must be free of State- or county-listed noxious weeds, oilfield debris, contaminated soil, and equipment.

### RECLAMATION PLAN

A reclamation plan is included in the Surface Use Plan of Operations and should discuss plans for final reclamation. Reclamation is required of any surface previously disturbed. The operator should submit a new plan with the Notice of Intent to Abandon (NIA) or Subsequent Report Plug and Abandon (SRA) using the Sundry Notices and Reports on Wells Form 3160-5 when abandoning wells and other facilities that do not have an approved reclamation plan. Additional reclamation measures may be required based on the conditions existing at the time of abandonment and made a part of the conditions of approval of the NIA or SRA. Earthwork for final reclamation generally must be completed within 6 months of plugging.

**Pit Reclamation** The site will be reclaimed to a natural condition that blends with the rest of the reclaimed pad area. In addition, the reclaimed pit will be restored to a safe and stable condition.

**Site Preparation and Revegetation** Disturbed areas will be revegetated after the site has been satisfactorily prepared. Site preparation will include respreading topsoil to an adequate depth, described by the sections below, and may also include ripping, tilling, disking on contour, and dozer track-imprinting. Seeding will be accomplished by drilling on the contour whenever practical or by other approved methods such as a dozer track-walking followed by broadcast seeding. Seeding will be performed according to the application specifications outlined by the BLM. BLM Seed Mixture 2 for sandy sites is to be applied as addressed below.

### Soil Cover Designs

The soil cover for site reclamation shall consist of one or more of the following parameters:

- (A) The soil cover for closures where the operator has removed the pit contents or remediated the contaminated soil to the divisions' satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.
- (B) The soil cover for burial-in-place or trench burial shall consist of a minimum of four feet of compacted, non-waste containing, earthen material. The soil cover shall include either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.
- (C) The holder shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

### Re-vegetation Procedure, using BLM Seed Mixture 2, for Sandy Sites

The holder will begin seeding the first growing season after the holder closes a pit or trench or is no longer using a drying pad, below-grade tank or an area associated with a closed-loop system, pit or below-grade tank, including access roads. Seeding shall be accomplished by drilling on the contour whenever practical or by other division-approved methods. The holder will seed all disturbed areas with the seed mixture listed below. The seed mixture shall be planted in the amounts specified in pounds of pure live seed (PLS)\* per acre. There shall be no primary or secondary noxious weeds in the seed mixture. Seed will be tested and the viability testing of seed will be done in accordance with State Law(s) and within nine (9) months prior to purchase. Commercial seed will be either certified or registered seed. The seed container will be tagged in accordance with State law(s) and available for inspection by the authorized officer.

Seed will be planted using a drill equipped with a depth regulator to ensure proper depth of planting where drilling is possible. The seed mixture will be evenly and uniformly planted over the disturbed area (smaller/heavier seeds have a tendency to drop to the bottom of the drill and are planted first). The holder will take appropriate measures to ensure that this does not occur. Where drilling is not possible, seed will be broadcast and the area shall be raked or chained to cover the seed. When broadcasting the seed, the pounds per acre are to be doubled. The holder shall obtain coverage 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 plants 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 will be no artificial irrigation of the vegetation. The holder will repeat seeding or planting as necessary, until it successfully achieves the required vegetation cover. Evaluation of growth will not be made before completion of at least one full growing season after seeding.

When conditions are not favorable for the establishment of vegetation, such as periods of drought, the holder may delay seeding or planting, with the division's approval, until soil moisture conditions

become favorable. However, the division may require the holder to use additional cultural techniques such as mulching, fertilizing, irrigating, fencing, or other practices to establish re-vegetation. The holder may propose an alternative to the re-vegetation plan if the holder demonstrates that the proposed alternative effectively prevents erosion, and protects fresh water, human health, and the environment. The proposed alternative shall be agreed upon by the surface owner. The holder will then submit the proposed alternative, with written documentation, that the surface owner agrees to the alternative, to the division for approval.

The holder will notify the division when it has seeded or planted and when it successfully achieves re-vegetation.

### **BLM Seed Mixture 2, for Sandy Sites**

Species to be planted in pounds of pure live seed\* per acre:

<u>Species</u>	<u>lb/acre</u>
Sand dropseed ( <i>Sporobolus cryptandrus</i> )	1.0
Sand love grass ( <i>Eragrostis trichodes</i> )	1.0
Plains bristlegrass ( <i>Setaria macrostachya</i> )	2.0

\*Pounds of pure live seed:

Pounds of seed x percent purity x percent germination = pounds pure live seed

## **WELL RECLAMATION**

### **Pit Locations, On-Site Burial Locations, and Drying Pads**

Once the holder has closed a pit or trench, or is no longer using a drying pad, below-grade tank or an area associated with a closed-loop system, pit, trench or below-grade tank, the holder will reclaim the pit location, drying pad location, below-grade tank location, or trench location and all areas associated with the closed-loop system, pit, trench or below-grade tank, including associated access roads, to a safe and stable condition that blends with the surrounding, undisturbed area. The holder shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by recontouring the location and associated areas to a contour that approximates the original contour blends with the surrounding topography and re-vegetate the site as stated previously.

**Final Reclamation** Restoration of the original landform is a key element in ensuring that the effects of oil and gas development are not permanent. To achieve final reclamation, the well site will be recontoured to original contour or a contour that blends with the surrounding landform, stockpiled topsoil redistributed, and the site revegetated.

In recontouring areas that have been surfaced with gravel or similar materials (caliche), the material must be removed from the well location or buried deep in the recontoured cut to prevent possible surface exposure. All excavations and pits will be closed in accordance with New Mexico Oil Conservation Division standards and graded to conform to the surrounding terrain.

Salvaged topsoil must be respread evenly over the surfaces to be revegetated. The topsoiled site will be prepared to provide a seedbed for reestablishment of desirable vegetation. Water breaks and terracing will only be installed when absolutely necessary to prevent erosion of fill material.