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

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

Form C-144
Revised April 3, 2017

**For temporary pits, below-grade tanks, and multi-well fluid management pits**, submit to the appropriate NMOCD District Office.
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Tracking # 16035
Permit # 15844

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

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

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

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

1.
Operator: Elm Ridge Exploration Co. LLC dba Beeline Gas Systems OGRID #: 194503
Address: #20 CR 5060, Bloomfield, NM 87413
Facility or well name: Buena Suerte Compressor Station- Southwest below grade tank
API Number: _____ OCD Permit Number: 15844
U/L or Qtr/Qtr J Section 32 Township 26N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.433466 Longitude 108.016794 NAD: 1983
Surface Owner: ☐ Federal ☒ State ☐ Private ☐ Tribal Trust or Indian Allotment

OIL CONS. DIV DIST. 3
AUG 24 2017

2.
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____bbl Dimensions: L_____ x W_____ x D_____

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 85 bbl Type of fluid: compressed liquids (H20 & HC), skid drain liquid
Tank Construction material: Welded Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____mil ☐ HDPE ☐ PVC ☐ Other _____

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



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5.

**Fencing:** Subsection D of 19.15.17.11 NMAC *(Applies to permanent pits, temporary pits, and below-grade tanks)*

☐ Chain link, six feet in height, two strands of barbed wire at top *(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)*

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☒ Alternate. Please specify: Facility is surrounded by a 6' pro panel fence

6.

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

☐ Screen ☐ Netting ☐ Other_____

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

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

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

☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

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

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

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

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

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

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

## General siting

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.** ☐ Yes ☒ No ☐ NA
- ☒ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .** ☐ Yes ☐ No ☒ NA
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)** ☐ Yes ☐ No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)** ☐ Yes ☐ No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Within an unstable area. **(Does not apply to below grade tanks)** ☐ Yes ☐ No
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Within a 100-year floodplain. **(Does not apply to below grade tanks)** ☐ Yes ☐ No
- FEMA map

## Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). ☐ Yes ☒ No
- Topographic map; Visual inspection (certification) of the proposed site

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. ☐ Yes ☒ No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

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

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) ☐ Yes ☐ No
- Topographic map; Visual inspection (certification) of the proposed site

| | |
|---|---|
| Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.<br>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 100 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| **Temporary Pit Non-low chloride drilling fluid** | |
| Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- 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.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 300 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| **Permanent Pit or Multi-Well Fluid Management Pit** | |
| 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).<br>- Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |

10.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

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

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

11.

**Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ A List of wells with approved application for permit to drill associated with the pit.
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including $H_2S$, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

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

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

Proposed Closure Method: ☒ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.

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

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

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

***Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.***

| | |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; 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.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | ☐ Yes ☐ No |
| Within a 100-year floodplain.<br>- FEMA map | ☐ Yes ☐ No |

16.
**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ 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 E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.
**Operator Application Certification:**

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

Name (Print): Dianna Hamilton Title: Health, Safety and Environmental Coordinator

Signature: Dianna R. Hamilton Date: August 21, 2017

e-mail address: dhamilton@djrllc.com Telephone: (505) 634-1144

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

**OCD Representative Signature:** [signature] **Approval Date:** 8/24/17

**Title:** Environmental Spec. **OCD Permit Number:** 15844

19.
**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

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

☐ **Closure Completion Date:**

20.
**Closure Method:**

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

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

- ☐ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ 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

22.

**Operator Closure Certification:**

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

**Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems**
**Buena Suerte Compressor Station**
**Registration of New Below-Grade Tank**

## Closure Plan

In accordance with 19.15.17.13 NMAC, the following plan describes the closure requirements of the new below-grade tank (BGT) in the Buena Suerte Compressor Station (BSCS) owned and operated by Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems (BGS). BSCS is located in San Juan County approximately 20 miles, by road, southwest of Bloomfield, NM.

## Closure Requirements Where Wastes are to be Disposed of Off-site

1. BGS shall dispose of all wastes at a division-approved facility.
2. BGS shall not commence closure without first obtaining approval of the closure plan submitted with this registration.
3. BGS shall close the BGT by first removing all contents and, if applicable, synthetic liners and transferring those materials to a division-approved facility.
4. BGS shall test the soils beneath the BGT as follows:
   a. At a minimum, a five-point composite sample to include any obvious stained or wet soils, or other evidence of contamination shall be taken under the liner or BGT and that sample shall be analyzed for the constituents listed in Table 1 of 19.15.17.13 NMAC (below).
   b. If any contaminant concentration is higher than the parameters listed in Table 1 of 19.15.17.13 NMAC (below) the division may require additional delineation upon review of the results and BGS must obtain approval before proceeding with closure.
   c. If all contaminant concentrations are less than or equal to the parameters listed in Table 1 of 19.15.17.13 NMAC (below), then BGS may proceed to backfill the excavation with division approved soil cover.

**Table I**
**Closure Criteria for Soils Beneath Below-Grade Tanks, Drying Pads Associated with Closed-Loop Systems and Pits where Contents are Removed**

| Depth below bottom of pit to groundwater less than 10,000 mg/l TDS | Constituent | Method* | Limit** |
|---|---|---|---|
| ≤50 feet | Chloride | EPA 300.0 | 600 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 100 mg/kg |
| | BTEX | EPA SW-846 Method 8021B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |

## Closure Plan (Continued)

| Table I (Continued)<br>Closure Criteria for Soils Beneath Below-Grade Tanks, Drying Pads Associated with Closed-Loop Systems and Pits where Contents are Removed | | | |
|---|---|---|---|
| Depth below bottom of pit to groundwater less than 10,000 mg/l TDS | Constituent | Method* | Limit** |
| 51 feet-100 feet | Chloride | EPA 300.0 | 10,000 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 2,500 mg/kg |
| | GRO+DRO | EPA SW-846 Method 8015M | 1,000 mg/kg |
| | BTEX | EPA SW-846 Method 8021B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |
| >100 feet | Chloride | EPA 300.0 | 20,000 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 2,500 mg/kg |
| | GRO+DRO | EPA SW-846 Method 8015M | 1,000 mg/kg |
| | BTEX | EPA SW-846 Method 8021B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |

## Timing Requirements and Closure Methods for Below-Grade Tanks

1. Within 60 days of cessation of operations, BGS shall remove liquids and sludge from the BGT prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.
2. Within six (6) months of cessation of operations, BGS shall remove the BGT and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division office approves. If there is any equipment associated with the BGT, then BGS shall remove the equipment, unless the equipment is required for some other purpose.
3. BGS shall notify the surface owner by certified mail, return receipt requested, that BGS plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Notice shall include operator name, facility name, NMOCD permit number, and location to be closed by unit letter, section, township, and range.
4. BGS shall notify the appropriate division office by certified mail, return receipt requested, that BGS plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Notice shall include operator name, facility name, NMOCD permit number, and location to be closed by unit letter, section, township, and range.

## Closure Plan (Continued)

### Reclamation of BGT Locations

1. Site Contouring
    a. Once the area associated with the BGT is no longer in use, BGS shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BGS shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) in Subsection H of 19.15.17.13 NMAC, recontour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) in Subsection H of 19.15.17.13 MMAC.
    b. BGS may propose an alternative to the re-vegetation or recontouring requirement if BGS demonstrates to the appropriate district office that the proposed alternative provides equal or better prevention of erosion, and protection of fresh water, public health, and the environment. The proposed alternative shall be agreed upon by the surface owner. BGS shall submit the proposed alternative, with written documentation that the surface owner agrees to the alternative, to the division for approval.
    c. In areas reasonably needed for production operations, BGS shall compact, cover, pave, or otherwise stabilize and maintain the areas in such a way as to minimize dust and erosion to the extent practicable.
2. Soil Cover Designs for a BGT
    a. The soil cover for closures after site contouring, where BGS has removed the BGT, contents, and liner, and if necessary remediated the soil beneath the BGT, shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.
    b. BGS shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.
3. Reclamation and Re-vegetation
    a. In areas no longer in use, except for areas reasonably needed for production operations, BGS shall reclaim all areas disturbed by the closure of the BGT as early and as nearly as practicable to their original condition or their final land use and BGS shall maintain the areas to control dust and minimize erosion to the extent practicable.
    b. BGS shall replace topsoil and subsoil to their original relative position and contoured so as to achieve erosion control, long-term stability, and preservation of surface water flow patterns. The disturbed area shall be reseeded in the first favorable growing season following closure of the BGT.
    c. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at

the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

d. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supercede these provisions and govern the obligations of BGS, if subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health, and the environment.
e. BGS shall notify the division when reclamation and re-vegetation are complete.

**Closure Report**

1. Within 60 days of closure completion, BGS shall submit a closure report on Form C-144, with necessary attachments to document all closure activities including sampling results; information on back-filling, capping, and covering, where applicable. In the closure report, BGS shall certify that all information in the report and attachments is correct and that BGS has complied with all applicable closure requirements and conditions specified in the closure plan.
2. The closure report will include the following:
    a. Proof of closure notice to surface owner and NMOCD;
    b. Back-filling and cover installation;
    c. Analytical results of confirmation sampling;
    d. Disposal facility name(s) and permit number(s);
    e. Application rate and seeding techniques if the entire facility is to be reclaimed;
    f. Photo documentation of the reclamation.

**Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems**
**Buena Suerte Compressor Station**
**Registration of New Below-Grade Tank**

## Exceptions and Variances

In accordance with 19.15.17.15 NMAC, regarding the proposed new below-grade tank (BGT) in the Buena Suerte Compressor Station (BSCS) owned and operated by Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems (BGS), we request the following exceptions and variances (E&V).

1. BGS desires to use a Rufco 4000B LLDPE liner as an alternative to a liner made from HDPE or PVC. The Rufco liner is 40-mils thick and we believe it to be as good or better than a 30-mil HDPE or PVC liner. A liner is not required for the double-wall, double-bottom tank BGS will install. The liner we plan to install is an additional level of protection to prevent contamination of fresh water; and to protect public health and the environment in the unlikely event of an overflow of the BGT. Please see the attached specifications for the Rufco liner.

2. BGS requests a variance to the requirement of stockpiling the topsoil from the excavation for this BGT. The tank will be located in an active compressor station with limited storage area. BGS proposes to use the soil from this excavation to backfill the excavation for another BGT we plan to close in the near future. BGS will sample and test the soil from the excavation for the new BGT and use it for backfill material only if the concentration of ***all*** constituents listed in Table 1 of 19.15.17.13 NMAC are ***less than or equal*** to the limits listed in the table. If the concentration of ***any*** of the listed constituents are ***greater than*** the limits listed in the table, the excavated soil will be disposed of in a division-approved facility.

3. BGS requests a variance to placing a sign on the fence surrounding the BGT. Because the BGT is to be located in a compressor station that is totally surrounded by a 6-foot propanel fence, BGS proposes to locate the required sign in a conspicuous place on the outside of the facility fence.

4. BGS requests a variance to testing for TPH by the EPA SW-846 Method 418.1. BGS proposes to use the EPA SW-846 Method 8015 Extended to test for GRO, DRO, and MRO.

# New Mexico Office of the State Engineer
# Water Right Summary

get image list

**WR File Number:** SJ 00221 **Subbasin:** - **Cross Reference:** -

**Primary Purpose:** DOM 72-12-1 DOMESTIC ONE HOUSEHOLD

**Primary Status:** PMT PERMIT

**Total Acres:** **Subfile:** -

**Total Diversion:** 3 **Cause/Case:** -

**Owner:** CHARLEY Y. BROWN

## Documents on File

| | Trn # | Doc | File/Act | Status 1 | Status 2 | Transaction Desc. | From/ To | Acres | Diversion | Consumptive |
|---|---|---|---|---|---|---|---|---|---|---|
| get images | 224422 | 72121 | 1977-04-08 | PMT | LOG | SJ 00221 | T | | 3 | |

## Current Points of Diversion

(NAD83 UTM in meters)

| POD Number | Source | Q Q Q 64 16 4 | Sec | Tws | Rng | X | Y | Other Location Desc |
|---|---|---|---|---|---|---|---|---|
| SJ 00221 | Artesian | 2 | 04 | 25N | 11W | 230613 | 4036253* | |

*An (*) after northing value indicates UTM location was derived from PLSS - see Help

224422

READ INSTRUCTIONS ON BACK

Revised March 1972

# APPLICATION TO APPROPRIATE UNDERGROUND WATERS IN ACCORDANCE WITH SECTION 75-11-1, NEW MEXICO STATUTES

77 APR 7 AM 11 19

STATE ENGINEER OFFIC
SANTA FE, N.M. 87501

File No. SJ-221

1. Name and Address of Applicant:

Charley Y Brown
Box 221
Bloomfield, New Mexico 87413

2. Describe well location under one of the following subheadings:

a. ____ ¼ ____ ¼ NE ¼ of Sec. 4 Twp. 25 Rge. 11 W N. M. P. M., in San Jaun County.

b. Tract No. ____ of Map No. ____ of the ____

c. Lot No. ____ of Block No. ____ of the ____
Subdivision, recorded in ____ County.

d. X = ____ feet, Y = ____ feet, N. M. Coordinate System ____ Zone
in the ____ Grant.

e. Give street address or route and box No. of property upon which well is to be located, or location by direction and distance from known landmarks At Carson Trading Post South of Bloomfield N.M.

3. Approximate depth (if known) 175 feet; outside diameter of casing 7 inches.

Name of driller (if known) William J. Hood

4. Use of water (check appropriate box or boxes):

- [X] Household, non-commercial trees, lawn and garden not to exceed 1 acre.
- [X] Livestock watering.
- [ ] Drinking and sanitary purposes and the irrigation of non-commercial trees, shrubs and lawns in conjunction with a commercial operation.
- [ ] Prospecting, mining or drilling operations to discover or develop natural resources.
- [ ] Construction of public works, highways and roads.

If any of the last three were marked, give name and nature of business under Remarks. (Item 5)

5. Remarks: ____

I, Charley Y. Brown, affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

Charley Y. Brown, Applicant

By: William J Hood Date: 4/6/77

## ACTION OF STATE ENGINEER

This application is approved for the use indicated, subject to all general conditions and to the specific conditions numbered 4 on the reverse side hereof. This permit will automatically expire unless this well is drilled or driven and the well record filed on or before April 30, 1978.

S. E. Reynolds, State Engineer

By: J. K. Couzens

J. K. Couzens, Engineer, WAter Rights Div.

Date: April 8, 1977 File No. SJ-221

# New Mexico Office of the State Engineer
# Water Right Summary

get image list

**WR File Number:** SJ 01716 **Subbasin:** - **Cross Reference:** -

**Primary Purpose:** STK 72-12-1 LIVESTOCK WATERING

**Primary Status:** DCL DECLARATION

**Total Acres:** 0 **Subfile:** -

**Total Diversion:** 15 **Cause/Case:** -

**Owner:** U.S. DEPT. OF INTERIOR

## Documents on File

| | Trn # | Doc | File/Act | Status 1 | Status 2 | Transaction Desc. | From/ To | Acres | Diversion | Consumptive |
|---|---|---|---|---|---|---|---|---|---|---|
| get images | 232061 | DCL | 1983-04-29 | DCL | PRC | SJ 01716 | T | 0 | 15 | |

## Current Points of Diversion

(NAD83 UTM in meters)

| POD Number | Source | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Other Location Desc |
|---|---|---|---|---|---|---|---|---|---|---|
| SJ 01716 | Shallow | 2 | 3 | 01 | | 25N | 12W | 225189 | 4035835* | |

*An (*) after northing value indicates UTM location was derived from PLSS - see Help

## Priority Summary

| Priority | Status | Acres | Diversion | Pod Number | Source |
|---|---|---|---|---|---|
| 02/05/1964 | DCL | 0 | 15 | SJ 01716 | Shallow |

## Place of Use

| Q 256 | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | Acres | Diversion | CU | Use | Priority | Status | Other Location Desc |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | 0 | 15 | | STK | 02/05/1964 | DCL | NO PLACE OF USE GIVEN |

## Source

| Acres | Diversion | CU | Use | Priority | Source Description |
|---|---|---|---|---|---|
| 0 | 15 | | STK | 02/05/1964 | GW |

Revised December 1975

23206

IMPORTANT — READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM.

HC-107368

# Declaration of Owner of Underground Water Right

SAN JUAN UNDERGROUND WATER BASIN
BASIN NAME

Declaration No. SJ-1716 Date received April 29, 1983

STATEMENT

1. Name of Declarant U. S. Dept. of Interior, Bureau of Land Management
   Mailing Address P. O. Box 568, Farmington, New Mexico 87499-0568
   County of San Juan, State of New Mexico
2. Source of water supply Nacimiento Formation
   (artesian or shallow water aquifer)
3. Describe well location under one of the following subheadings:
   a. ____ ¼ NE ¼ SW ¼ of Sec. 1 Twp. 25 N. Rge. 12 W. N.M.P.M., in San Juan County.
   b. Tract No. ____ of Map No. ____ of the ____
   c. X = ____ feet, Y = ____ feet, N. M. Coordinate System ____ Zone in the ____ Grant.
   On land owned by Bureau of Land Management (see address above)
4. Description of well: date drilled 6/20/63-2/5/64 driller W. R. West Drilling Co. depth 403 feet.
   outside diameter of casing 6 5/8 inches; original capacity 40 gal. per min.; present capacity 40 gal. per min.; pumping lift 375 feet; static water level 210 feet ~~(above)~~ (below) land surface;
   make and type of pump 1 7/8 inch cylinder (plunger on sucker rod)
   make, type, horsepower, etc., of power plant 14 foot diameter aermotor mounted on steel tower.
   Fractitional or percentage interest claimed in well 100% (all)
5. Quantity of water appropriated and beneficially used ____ (acre feet per acre) 15 (acre feet per annum) for livestock and wildlife purposes.
6. Acreage actually irrigated N/A acres, located and described as follows (describe only lands actually irrigated):

| Subdivision | Sec. | Twp. | Range | Acres Irrigated | Owner |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

(Note: location of well and acreage actually irrigated must be shown on plat on reverse side.)

7. Water was first applied to beneficial use 2 (month) 5 (day) 1964 (year) and since that time has been used fully and continuously on all of the above described lands or for the above described purposes except as follows: N/A
8. Additional statements or explanations Carson No. 1 Well (see Log of Well and Project Completion Report)

I, Farmington Resource Area Manager being first duly sworn upon my oath, depose and say that the above is a full and complete statement prepared in accordance with the instructions on the reverse side of this form and submitted in evidence of ownership of a valid underground water right, that I have carefully read each and all of the items contained therein and that the same are true to the best of my knowledge and belief.

Jim Sims, declarant.

by: ____

Subscribed and sworn to before me this 25 day of April, A.D. 1983

My commission expires April 13, 1987 Shirley C. Davenport Notary Public

FILED
UNDER NEW MEXICO LAW A DECLARATION IS ONLY A STATEMENT OF DECLARANT'S CLAIM.
ACCEPTANCE FOR FILING DOES NOT CONSTITUTE APPROVAL OR REJECTION OF THE CLAIM.

STATE ENGINEER OFFICE
ALBUQUERQUE, N. MEX.
83 APR 29 AM 10 35

Log in location file

# United States Department of the Interior

IN REPLY REFER TO
7421

BUREAU OF LAND MANAGEMENT
FARMINGTON RESOURCE AREA
P.O. BOX 568
FARMINGTON, NEW MEXICO 87499-0568

APR 28 1983

New Mexico State Engineer
District I Office
2340 Menaul, NE, Suite 206
Albuquerque, New Mexico 87107-1884

Dear Sir:

Enclosed, please find Declaration of Owner of Underground Water Right for sixteen of our wells for livestock and wildlife watering purposes. Sixteen dollars are enclosed for filing fees.

If you have any questions, please call Dana Shuford of our staff (505-325-3581).

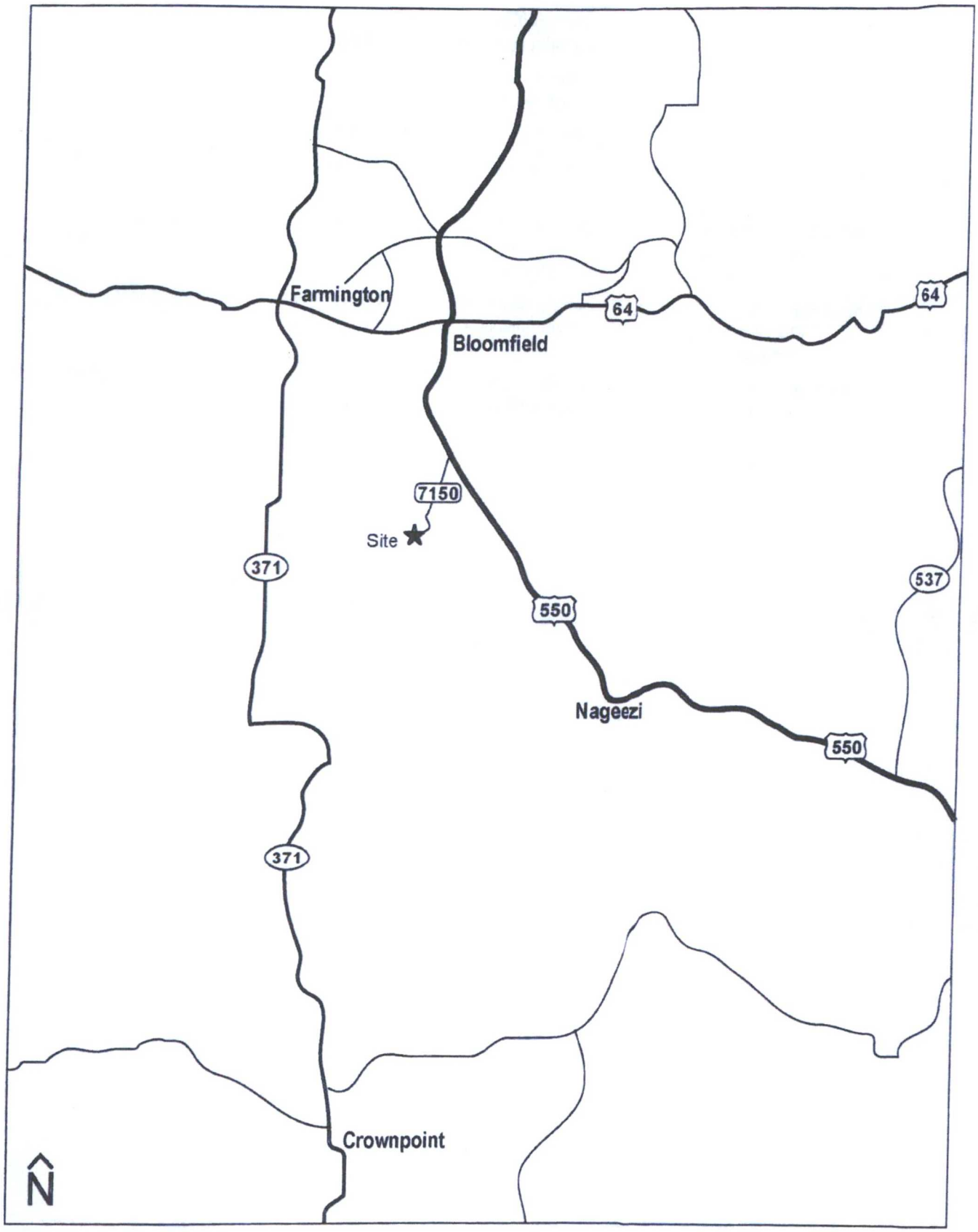
Sincerely yours,

acting Area Manager

Enclosures

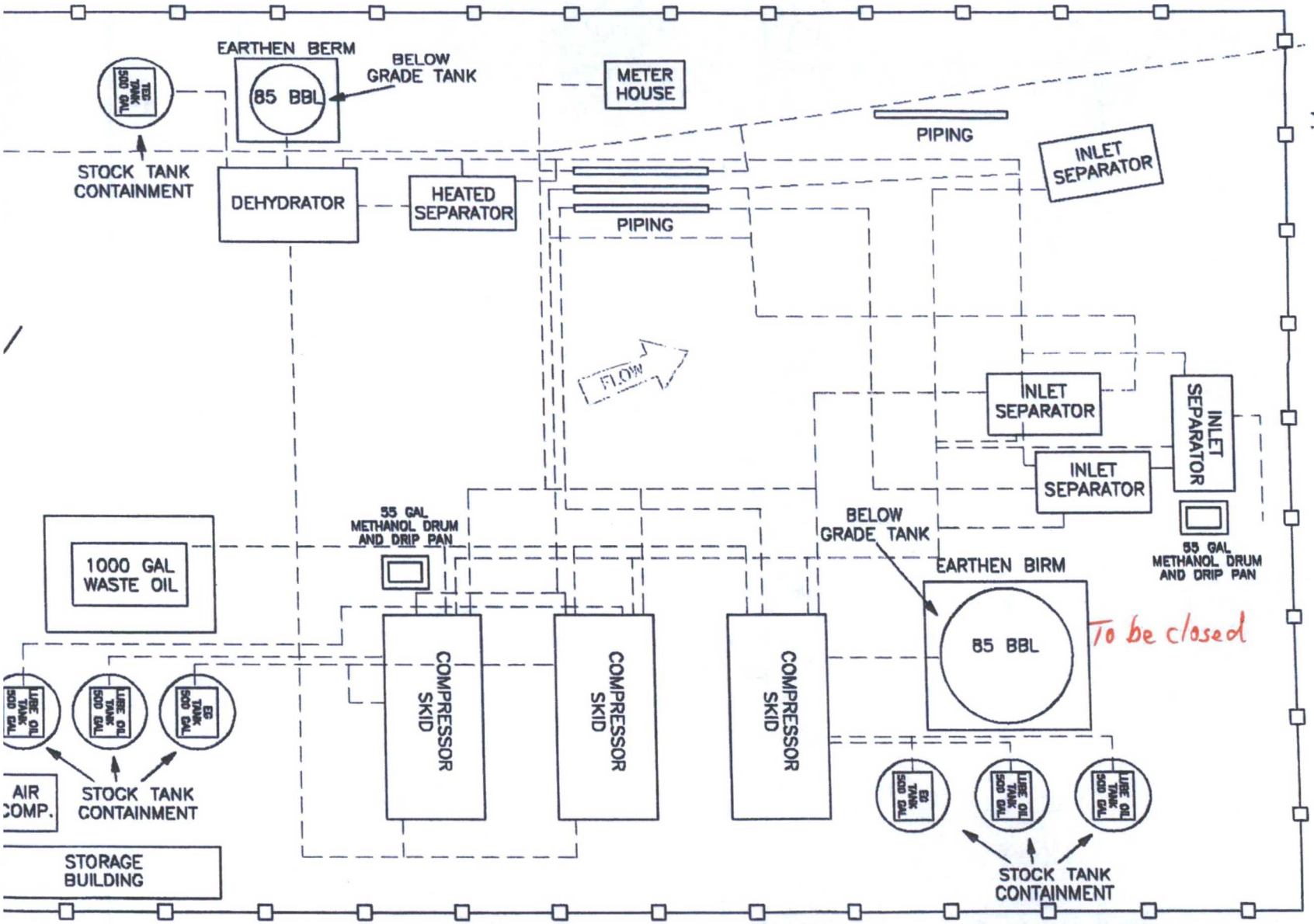
83APR 29 A10:34
ALBUQUERQUE, N. MEX.

# APPENDIX A




Beeline Gas Systems - Buena Suerte Compressor Station

Location Map - Approximately 20 miles SW of Bloomfield, San Juan County, NM






Beeline Gas Systems, Inc. - Buena Suerte Compressor Station