

7.

OCD Approval: ☒ Permit Application (including closure plan) ☐ Closure Plan (only)OCD Representative Signature: Jonathan D. Kelly Approval Date: 6/09/2011Title: Compliance Officer OCD Permit Number: \_\_\_\_\_

8.

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

9.

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

10.

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

**BP AMERICA PRODUCTION COMPANY**  
**San Juan Basin in Northwest New Mexico**  
**Closed Loop System**  
**General Operating, Maintenance and Closure Plan**

Pursuant to Rule 19.15.17.12 NMAC, BP America Production shall maintain and operate a closed loop system with the following guidelines. Any deviations from this plan will be addressed with the submittal of Form C-144 at the time of the permit application.

- A). The closed loop system will be operated and maintained to contain liquids and prevent contamination of fresh water, protect public health and the environment.
- B). Well workover fluids will be re-used, recycled or disposed in a manner to protect fresh water, public health and the environment. Fluids and other wastes will be disposed at various NMOCD permitted sites, as listed at the end of this document. The listed disposal site permits allow acceptance of the specific exempt wastes generated (liquid or solids) during the proposed well work.
- C). No hazardous waste will be discharged or stored in the closed loop system, tanks or bins. Only solids and fluids generated during the well work process will be placed in storage containers.
- D). If the system develops a leak or is otherwise penetrated, including any freeboard portions, all liquids above the failure will be removed within 48 hours. The NMOCD Aztec District office will be notified within 48 hours and the failure will be either repaired or the container will be replaced. If a tank or bin develops a leak or is penetrated anywhere above the freeboard portion of the pit, the NMOCD Aztec District office will be notified within 48 hours and it will be repaired.
- I). The system will be inspected at least daily for integrity while the rig is on site.
- J). All free liquids will be removed from the system following well work and transported to an appropriate waste disposal facility, as listed below. Solids will be transported in transport bins to an appropriate waste disposal facility, as listed below.
- K). Tanks, bins and other apparatus of the closed loop system will be removed from the site as part of the rig move operation.

**Proposed waste disposal sites:**

BP Crouch Mesa Landfarm, Permit NM-02-003  
 JFJ Landfarm, Permit NM-01-010(B)  
 Basin Disposal, Permit NM-01-0005  
 BP Operated E.E. Elliott SWD #1, API 30-045-27799  
 BP Operated 13 GCU SWD #1, API 30-045-28601  
 BP Operated GCU 259 SWD, API 30-045-20006  
 BP Operated GCU 306 SWD, API 30-045-24286  
 BP Operated GCU 307 SWD, API 30-045-24248  
 BP Operated GCU 328 SWD, API 30-045-24735  
 BP Operated Pritchard SWD #1, API 30-045-28351

# BP AMERICA PRODUCTION COMPANY

San Juan Basin in Northwest New Mexico

Closed Loop System for Well Workovers/PxA Operations

General Design and Construction Plan

Pursuant to Rule 19.15.17.11 NMAC, BP America Production (BP) will design and operate a closed loop system with the following guidelines. Any deviations from this plan will be addressed with the submittal of Form C-144 at the time of the permit application.

- A). The system will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment. It will be comprised of steel tanks and/or rolloff bins to contain well returns, cuttings, spent cement or other materials that may come from the well. No fencing is required for a closed loop system.
- B) An upright sign, not less than 12" x 24" with lettering not less than 2" height will be placed near the system. Alternatively, a well sign in compliance with 19.15.3.103 NMAC will be posted at the well site. The sign will give BP's name, location by quarter-quarter or unit letter, section, township and range, and emergency phone numbers.
- C) The closed loop will be designed to ensure the confinement of oil, gas and water and other well returns and to prevent unauthorized releases. All tanks and bins will be of welded seam design with connecting piping installed and fitted to maintain system integrity. Drain valves will have blank plugs in place when fluid is in a tank or bin to prevent a fluid release to the ground surface in the event of an accidental valve opening.
- D) One or more frac tanks will be used on site to store water that has been transported to the location for the workover or PxA operations.