Form C-144 Revised June 6, 2013

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

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.

12568	Pit, Below-Grade Tank, or	OCD Received
45-34242	Proposed Alternative Method Permit or Closure Plan Application	1-16-15
ä	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 proposed alternative method Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative	
Please be advised tha	at 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 do	bes approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rule	s, regulations or ordinances
1. Operator: Burlin	gton Resources OGRID #: 14538	
	PO BOX 4289, Farmington, NM 87499	
	me: Holder A 100	
API Number: _300	04534242 OCD Permit Number:	
U/L or Qtr/Qtrl	F (SENW) Section 6 Township 30N Range 12W County: San Juan	
973	d Design: Latitude <u>36.84503</u> ºN Longitude <u>-108.14242</u> <u>°W</u> NAD: ⊠1927 □ 1983	
Surface Owner:	🛮 Federal 🗌 State 🗌 Private 🗌 Tribal Trust or Indian Allotment <mark>OCD NAD83 36.844926 108.</mark> 1	42346
	4	
Permanent Uni Lined Uni String-Reinfor	Prilling Workover Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid Liner type: Thicknessmil LLDPE HDPE PVC Otherreed Welded Factory Other Volume:bbl Dimensions: L	
Volume: Tank Construction ☐ Secondary co ☐ Visible sidew	tank: Subsection I of 19.15.17.11 NMAC 120	
4. Alternative M Submittal of an ex	1ethod: Acception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for co	nsideration of approval.
Chain link, six institution or chuic	tht, four strands of barbed wire evenly spaced between one and four feet	, school, hospital,

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				
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				
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 accept material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	table source			
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - □ 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. 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) - 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) - 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) - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	Yes No No NA Yes No No NA Yes No No Yes No Yes No Yes No Yes No Yes No Yes No Ye			
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map Below Grade Tanks	Yes No			
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). 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;. 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.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	☐ Yes ☐ No				
application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
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. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Within 100 feet of a wetland. - 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). - 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 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; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Within 300 feet of a wetland. - 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). - 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. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
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 NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ 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				
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.91	NMAC				
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached.	ocuments are				
 ☐ 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. ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC 	9 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 and 19.15.17.13 NMAC).15.17.9 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 de	ocuments 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 I	9.15.17.9 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					
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:					
Previously Approved Design (attach copy of design) API Number: of Perinit 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 doct	ruments are				
#####################################					
□ 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 H₂S, 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.	7				
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fluid Alternative	d Management Pit				
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					
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attaclosure 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	ached to the				
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 provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Ple 19.15.17.10 NMAC for guidance.	e material are case refer to				
Ground water is less than 25 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 25-50 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 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 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). Topographic map; Visual inspection (certification) of the proposed site					
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - 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. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
	☐ Yes ☐ No				
Within 300 feet of a wetland. 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. Written confirmation or verification from the municipality:						
William Commission of the Comm	Written approval obtained from the municipality	☐ 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 & Mineral Resources; USGS; NM Geological Society; Topographic map □ Yes □ No						
Within a 100-year floodplain. - FEMA map ☐ Yes ☐ No						
by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the Proof of Surface Owner Notice - based upon the appropriate Construction/Design Plan of Burial Trench (if applicable) be Construction/Design Plan of Temporary Pit (for in-place bu Protocols and Procedures - based upon the appropriate requi Confirmation Sampling Plan (if applicable) - based upon the Waste Material Sampling Plan - based upon the appropriate Disposal Facility Name and Permit Number (for liquids, dri Soil Cover Design - based upon the appropriate requiremen Re-vegetation Plan - based upon the appropriate requiremer Site Reclamation Plan - based upon the appropriate requiremer	e requirements of Subsection E of 19.15.17.13 NMAC passed upon the appropriate requirements of Subsection K of 19.15.17 rial of a drying pad) - based upon the appropriate requirements of 19 irements of 19.15.17.13 NMAC e appropriate requirements of 19.15.17.13 NMAC requirements of 19.15.17.13 NMAC requirements of 19.15.17.13 NMAC filling fluids and drill cuttings or in case on-site closure standards can ts of Subsection H of 19.15.17.13 NMAC hts of Subsection H of 19.15.17.13 NMAC	7.11 NMAC).15.17.11 NMAC				
Operator Application Certification: Learney cortify that the information submitted with this application.	on is true, accurate and complete to the best of my knowledge and be	elief.				
Name (Print):						
Signature:	Date:					
e-mail address:	Telephone:					
OCD Approval: Permit Application (including closure plan)	OCD Conditions (see attachment) Approval Date: Feb 12	, 2015				
OCD Representative Signature:						
Title: Environmental Specialst	OCD Permit Number:					
19.						
Closure Report (required within 60 days of closure completion	sure plan prior to implementing any closure activities and submith thin 60 days of the completion of the closure activities. Please do n	ng the closure report. not complete this				
Closure Report (required within 60 days of closure completion instructions: Operators are required to obtain an approved closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the division with the closure report is required to be submitted to the closure report is required to be submitted to the closure report is required to be submitted to the closure report is required to the closure r	sure plan prior to implementing any closure activities and submith thin 60 days of the completion of the closure activities. Please do nained and the closure activities have been completed. Closure Completion Date: 12/20/12	ioi compiete inis				

22.	
Operator Closure Certification:	the state of the s
I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure require	ments and conditions specified in the approved closure plan.
Name (Print): Kenny Davis	Title: _Staff Regulatory Technician
Signature:	Date: 12/3/14
e-mail address: kenny.r.davis@conocophillips.com	Telephone: <u>505-599-4045</u>

Burlington Resources Oil Gas Company, LP San Juan Basin Below Grade Tank Closure Report

Lease Name: Holder A 100

API No.: 3004534242

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

- 1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
- 2. The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.
- 3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit #NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

All on-site equipment associated with the below-grade tank was removed.

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall 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 analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached).

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

If the sampling program demonstrates that a release has not occurred or that any release does not exceed the
concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted,
non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the
site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is missing due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner not found. COPC was not aware that the original notification sent at the time of Permitting was not the only closure notification required.

ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping, including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved

methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. 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. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation (See Report)
 - Re-vegetation application rates and seeding techniques (See Report)
 - Photo documentation of the site reclamation (Included as an attachment)
 - Confirmation Sampling Results (Included as an attachment)
 - Proof of closure notice (Included as an attachment)

Closure Documentation was not submitted within the 60 day requirement due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to ensure closure documentation is submitted with the 60 day time frame.



February 4, 2013

Crystal Tafoya ConocoPhillips San Juan Business Unit Office 214-05 5525 Hwy 64 Farmington, New Mexico 87401 www.animasenvironmental.com

624 E. Comanche Farmington, NM 87401 505-564-2281

> Durango, Colorado 970-403-3084

RE: Below Grade Tank Closure Report

Holder A #100

San Juan County, New Mexico

Dear Ms. Tafoya:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Holder A #100 located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name - Holder A #100

Legal Description – SE¼ NW¼, Section 6, T30N, R12W, San Juan County, New Mexico Well Latitude/Longitude – N36.84515 and W108.14236, respectively BGT Latitude/Longitude – N36.84495 and W108.14233, respectively Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, December 2012

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a C-144 form dated October 2008 for the Holder A #100 contained a cathodic report for the Holder A #1E that documented the depth to groundwater as 220 feet below ground surface (bgs). The New Mexico Office of the State Engineer (NMOSE) database was reviewed for nearby water wells, and no registered water wells were reported to be located within 1,000 feet of the location. Additionally, Google Earth and the New Mexico Tech Petroleum Recovery Research Center online mapping tool

Crystal Tafoya Holder A #100 BGT Closure Report February 4, 2013 Page 2 of 5

(http://ford.nmt.edu/react/project.html) were accessed to aid in the identification of downgradient surface water.

Once on site, AES personnel further assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was between 50 and 99 feet bgs. An unnamed wash which drains to the Farmington Glade is located approximately 500 feet south of the location. Based on this information, the location was assessed a ranking score of 20.

1.3 BGT Closure Assessment

AES was initially contacted by Jess Henson, CoP representative, on December 20, 2012, and on that day Deborah Watson and Heather Woods of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On December 20, 2012, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Screening

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1.

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM were 0.0 ppm and field TPH concentrations were less than 20.0 mg/kg in each sample (S-1 through S-5). The field chloride concentration in SC-1 was 120 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results
Holder A #100 BGT Closure, December 2012

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Action	Level (NMAC 19.	15.17.13E)		100	250
S-1	12/20/12	0.5	0.0	<20.0	NA
S-2	12/20/12	0.5	0.0	<20.0	NA
S-3	12/20/12	0.5	0.0	<20.0	NA
S-4	12/20/12	0.5	0.0	<20.0	NA
S-5	12/20/12	0.5	0.0	<20.0	NA
SC-1	12/20/12	0.5	NA	NA	120

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.050 mg/kg and 0.25 mg/kg, respectively. The laboratory chloride concentration was reported as 290 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Table 2. Soil Laboratory Analytical Results Holder A #100 BGT Closure, December 2012

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action	Level (NMAC 19.15	.17.13E)	0.2	50	1	00	250
SC-1	12/20/12	0.5	<0.050	<0.25	NA	NA	290

NA - not analyzed

3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with less than 20 mg/kg in each sample (S-1 through S-5). Laboratory analytical results for benzene and total BTEX concentrations in SC-1 were below the NMOCD action level of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 exceeded the NMOCD action level of 250 mg/kg, with 290 mg/kg. However, CoP consulted with NMOCD and BLM and was subsequently authorized to backfill by Brandon Powell of NMOCD on January 3, 2013, and by Mark Kelly of BLM on January 7, 2013. Based on field screening and laboratory analytical results for benzene, total BTEX, and TPH, as well as regulatory approval for chlorides, no further work is recommended at the Holder A #100.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,

Landrea Cupps

Environmental Scientist

Landres R. Cupps

Crystal Tafoya Holder A #100 BGT Closure Report February 4, 2013 Page 5 of 5

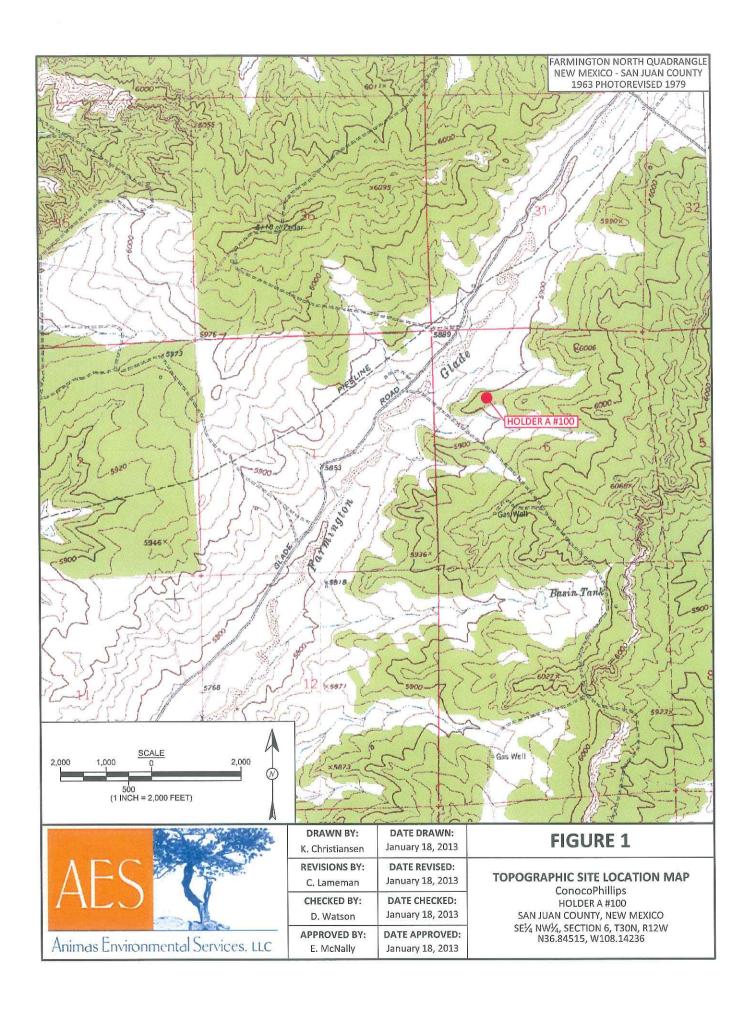
Elizabeth V MeNelly

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, December 2012 AES Field Screening Report 122012 Hall Analytical Report 1212976

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\Holder A #100\Holder A #100 BGT Closure Report 020413.docx





SAMPLE LOCATIONS

	Field Scr	eening R	esults	
Sample ID Date		OVM- PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD AC	TION LEVEL		100	250
S-1	12/20/12	0.0	<20.0	NA
S-2	12/20/12	0.0	<20.0	NA
S-3	12/20/12	0.0	<20.0	NA
S-4	12/20/12	0.0	<20.0	NA
S-5	12/20/12	0.0	<20.0	NA
SC-1	12/20/12	NA	NA	120

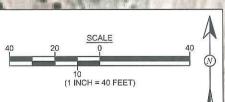
SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5. NA - NOT ANALYZED

		Laborato	ry Analytica	l Results		
Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		0.2	50	10	00	250
SC-1	12/20/12	<0.050	<0.25	NA	NA	290

SAMPLE WAS ANALYZED PER EPA METHOD 8021B AND 300.0.







AERIAL SOURCE: © 2012 MICROSOFT CORPORATION - AVAILABLE EXCLUSIVELY BY DIGITALGLOBE

IAFS	
1 100	
Animas Enviro	nmental Services, LLC

	DRAWN BY: . Christiansen	DATE DRAWN: January 18, 2013
	EVISIONS BY: C. Lameman	DATE REVISED: January 18, 2013
(CHECKED BY: D. Watson	DATE CHECKED: January 18, 2013
А	PPROVED BY: E. McNally	DATE APPROVED: January 18, 2013

FIGURE 2

AERIAL SITE MAP DECEMBER 2012

ConocoPhillips HOLDER A #100 SAN JUAN COUNTY, NEW MEXICO SE¹⁄₄ NW¹⁄₄, SECTION 6, T30N, R12W N36.84515, W108.14236

AES Field Screening Report

Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche Farmington, NM 87401 505-564-2281

Durango, Colorado 970-405-3084

Project Location: Holder A #100 Date: 12/20/2012

Matrix: Soil

Client: ConocoPhillips

		Time of			Field	Field TPH				ТРН
	Collection	Sample	Sample	OVM	Chloride	Analysis	Field TPH*	TPH PQL		Analysts
Sample ID	Date	Collection	Location	(bpm)	(mg/kg)	Time	(mg/kg)	(mg/kg)	DF	Initials
S-1	S-1 12/20/2012	12:40	North	0.0	NA	15:27	<20.0	20.0	П	DAW
S-2	12/20/2012	12:43	South	0.0	NA	15:29	<20.0	20.0	П	DAW
S-3	12/20/2012	12:45	East	0.0	NA	15:31	<20.0	20.0	П	DAW
S-4	12/20/2012	12:48	West	0.0	NA	15:33	<20.0	20.0	H	DAW
S-5	12/20/2012	12:50	Center	0.0	NA	15:36	<20.0	20.0	┖	DAW
SC-1	SC-1 12/20/2012	12:52	Composite	NA	120		Not A	Not Analyzed for TPH.	H.	

Practical Quantitation Limit PQL Not Detected at the Reporting Limit ND

Not Analyzed NA

*Field TPH concentrations recorded may be below PQL. Dilution Factor

Analyst:

Total Petroleum Hydrocarbons - USEPA 418.1

Silver Nitrate

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with

Report Finalized: 12/20/12



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

December 28, 2012

Debbie Watson Animas Environmental Services 624 East Comanche Farmington, NM 87401 TEL: (505) 486-4071

FAX

RE: COP Holder A #100

OrderNo.: 1212976

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/21/2012 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman

Laboratory Manager

Only

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report Lab Order 1212976

Date Reported: 12/28/2012

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services

Tilling Dilling Dilling

Lab ID: 1212976-001

Project:

COP Holder A #100

Client Sample ID: SC-1

Collection Date: 12/20/2012 12:52:00 PM

Received Date: 12/21/2012 9:55:00 AM

Result	RL Qu	al Units	DF	Date Analyzed
				Analyst: NSB
ND	0.050	mg/Kg	1	12/21/2012 12:52:01 PM
ND	0.050	mg/Kg	1	12/21/2012 12:52:01 PM
ND	0.050	mg/Kg	4	12/21/2012 12:52:01 PM
ND	0.10	mg/Kg	1	12/21/2012 12:52:01 PM
103	80-120	%REC	1	12/21/2012 12:52:01 PM
				Analyst: SRM
290	30	mg/Kg	20	12/21/2012 2:44:11 PM
	ND ND ND ND 103	ND 0.050 ND 0.050 ND 0.050 ND 0.10 103 80-120	ND 0.050 mg/Kg ND 0.050 mg/Kg ND 0.050 mg/Kg ND 0.10 mg/Kg 103 80-120 %REC	ND 0.050 mg/Kg 1 ND 0.050 mg/Kg 1 ND 0.050 mg/Kg 1 ND 0.10 mg/Kg 1 103 80-120 %REC 1

Matrix: SOIL

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits Page 1 of 2

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1212976

28-Dec-12

Client:

Animas Environmental Services

Project:

COP Holder A #100

Sample ID MB-5409

SampType: MBLK

TestCode: EPA Method 300.0: Anions

LowLimit

LowLimit

64.4

64.4

90

Client ID: PBS Batch ID: 5409

RunNo: 7711

Prep Date: 12/21/2012

Analysis Date: 12/21/2012

SeqNo: 224045

Units: mg/Kg

Analyte

Result

PQL SPK value SPK Ref Val

SPK value SPK Ref Val

15.00

15.00

15.00

%REC LowLimit

HighLimit

%RPD **RPDLimit** Qual

Chloride

Analyte

Chloride

ND

Result

14

SampType: LCS

1.5

TestCode: EPA Method 300.0: Anions

Client ID: LCSS

Sample ID LCS-5409

Batch ID: 5409

RunNo: 7711

Prep Date: 12/21/2012

Analysis Date: 12/21/2012

SeqNo: 224046 %REC

92.4

Units: mg/Kg

HighLimit %RPD 110

Qual

Sample ID 1212976-001BMS

SampType: MS

TestCode: EPA Method 300.0: Anions

Client ID: SC-1

Batch ID: 5409

RunNo: 7711

Units: mg/Kg

Prep Date: 12/21/2012

Analysis Date: 12/21/2012

30

30

POL

1.5

SeqNo: 224049

72.1

%RPD

Analyte Chloride

Result 300

290

SPK value SPK Ref Val PQL

%REC

HighLimit 117

RPDLimit

RPDLimit

Qual

Sample ID 1212976-001BMSD

SampType: MSD

TestCode: EPA Method 300.0: Anions

Client ID: SC-1

12/21/2012

Batch ID: 5409

RunNo: 7711 SegNo: 224051

Units: mg/Kg

RPDLimit

Qual

Analyte Chloride

Prep Date:

Analysis Date: 12/21/2012 Result POL

SPK value SPK Ref Val %REC 285.3

285.3

LowLimit 41.3

HighLimit 117 %RPD 1.57

20

S

Oualifiers:

- Value exceeds Maximum Contaminant Level.
- Е Value above quantitation range
- J Analyte detected below quantitation limits
- Sample pH greater than 2

- Analyte detected in the associated Method Blank В
- Holding times for preparation or analysis exceeded H
- ND Not Detected at the Reporting Limit
- RPD outside accepted recovery limits

Page 2 of 2



Hall Environmental Analysis Laborator) 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-410; Website: www.hallenvironmental.com

Sample Log-In Check List

Work Order Number: 1212976 Animas Environmental Client Name: Received by/date: am Il-12/21/2012 9:55:00 AM Logged By: Anne Thorne am Il-12/21/2012 Completed By: **Anne Thorne** 12 12 Reviewed By: Chain of Custody Yes No D Not Present ✓ 1. Were seals intact? Yes V No Not Present 2. Is Chain of Custody complete? 3. How was the sample delivered? Courier Log In Yes V No NA 🗍 4. Coolers are present? (see 19. for cooler specific information) Yes V No NA 🗌 5. Was an attempt made to cool the samples? Yes V No NA 🗌 6 Were all samples received at a temperature of >0° C to 6.0°C Yes V No 7. Sample(s) in proper container(s)? Yes V No 🗆 8 Sufficient sample volume for indicated test(s)? Yes 🗹 No 🗌 9. Are samples (except VOA and ONG) properly preserved? Yes No V NA [10. Was preservative added to bottles? Yes ☐ No ☐ No VOA Vials ☑ 11. VOA vials have zero headspace? Yes No V 12. Were any sample containers received broken? # of preserved Yes V No 13. Does paperwork match bottle labels? bottles checked (Note discrepancies on chain of custody) for pH: Yes V No (<2 or >12 unless noted) 14. Are matrices correctly identified on Chain of Custody? Adjusted? Yes V No 15. Is it clear what analyses were requested? Yes 🗹 No 🗌 16. Were all holding times able to be met? (If no, notify customer for authorization.) Checked by: Special Handling (if applicable) Yes No D NA V 17. Was client notified of all discrepancies with this order? Person Notified: Date eMail Phone Fax In Person By Whom: Regarding: Client Instructions: 18. Additional remarks: 19 Cooler Information Condition | Seal Intact | Seal No | Seal Date Cooler No Temp °C Signed By 1.0 Good

Date: Time: Relinquished by: Received by: Date Time Remarks: Buil to ConocoPhillips 12 Date: Time: Relinquished by: Date: Time: Remarks: Buil to ConocoPhillips 12 Date: Time: Remarks: Buil to ConocoPhillips 12 Date: Time: Remarks: Buil to ConocoPhillips
Time: Relinquished by: Received by: Date Time Activity; (2000)

District I 1625 N. French Dr., Hobbs, NM 88240 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

Section

6

Type of Release BGT Closure Summary

Township

30N

Range

12W

Feet from the

1410

Unit Letter

F

State of New Mexico Energy Minerals and Natural Resources

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

Revised October 10, 2003

Form C-141

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Releas	se Notificatio	n and Corrective Actio	n		
		OPERATOR	☐ Initial Report	\boxtimes	Final Report
Name of Company Burlington Resources		Contact Kenny Davis			
Address 3401 East 30th St, Farmington, NM		Telephone No.(505) 599-4045			
Facility Name: Holder A 100		Facility Type: Gas Well			
Surface Owner Federal	Mineral Owner	Federal	Lease No. SF-077	482	
	LOCATIO	N OF RELEASE			

Feet from the

1350

Volume of Release N/A

East/West Line

West

County

Volume Recovered N/A

San Juan

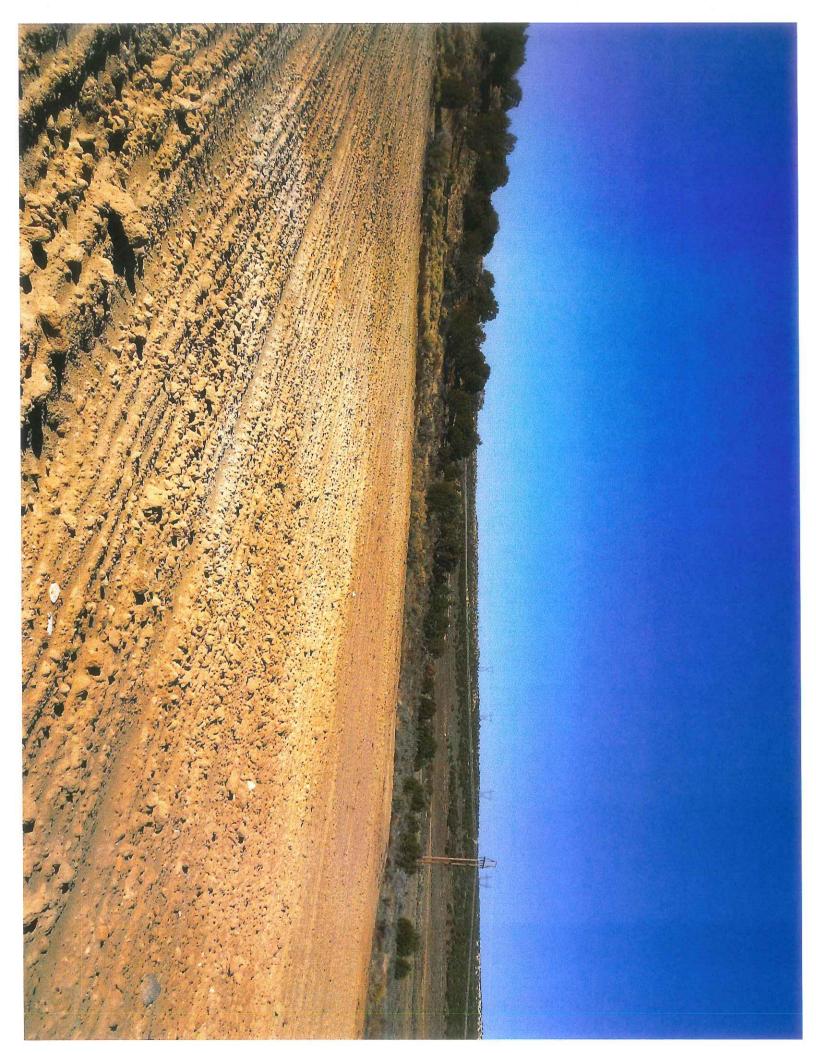
Latitude 36.84503 Longitude 108.14242

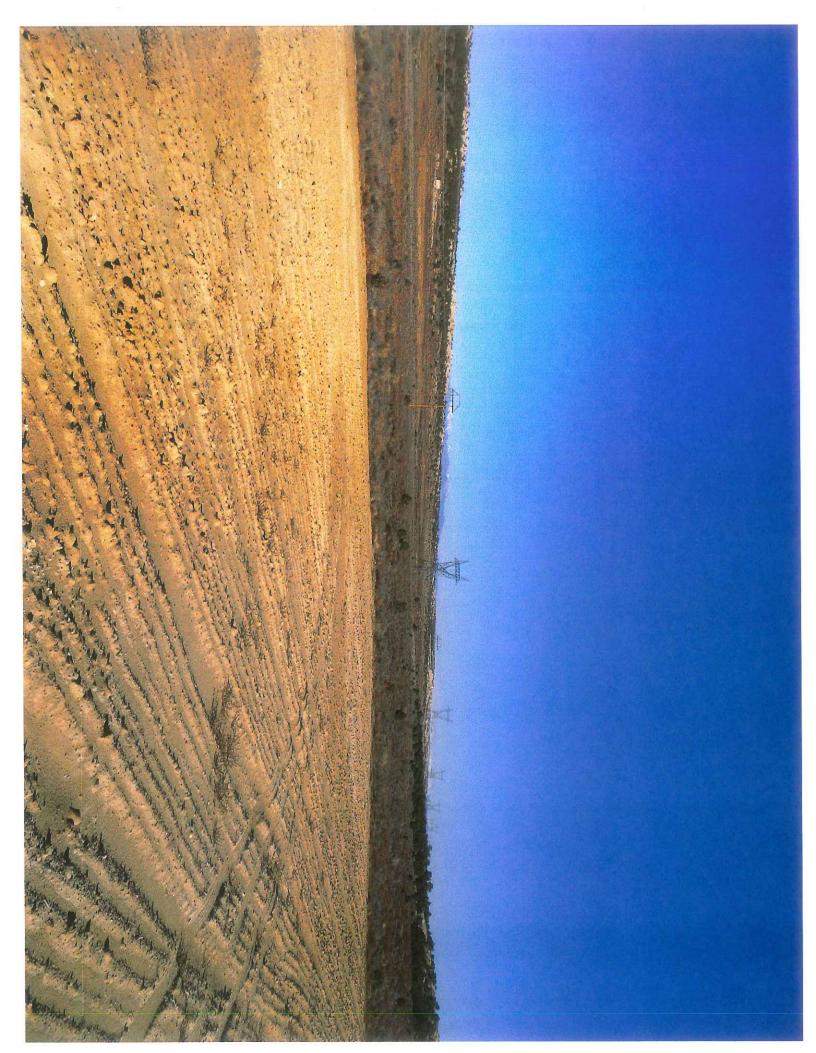
North/South Line

North

NATURE OF RELEASE

Source of Release: NONE	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A			
Was Immediate Notice Given?	If YES, To Whom?				
☐ Yes ☐ No ☒ Not Required	N/A				
Whom? N/A Date and Hour N/A					
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.				
N/A ☐ Yes ☒ No	N/A				
If a Watercourse was Impacted, Describe Fully.*					
N/A					
0					
Describe Cause of Problem and Remedial Action Taken.*					
N/A					
		at a			
Describe Area Affected and Cleanup Action Taken.*					
BGT Closure: NO RELEASE FOUND UPON REMOVAL					
BGI CROWN IN TELEBRICA I COLLEGE CONTROL COLLEGE					
	4 1	to differ appropriate NIMOCD sules and			
I hereby certify that the information given above is true and complete to	the best of my knowledge and unders	etions for releases which may endanger			
regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability					
should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health					
or the environment. In addition, NMOCD acceptance of a C-141 report of	does not relieve the operator of respon	nsibility for compliance with any other			
federal, state, or local laws and/or regulations.					
OIL CONSERVATION DIVISION					
Signature:					
Printed Name: Kenny Davis	Approved by District Supervisor:				
Frinted Name: Kenny Davis					
Title: Staff Regulatory Technician	Approval Date:	Expiration Date:			
	man house has a				
E-mail Address: Kenny.r.davis@conocophillips.com	Conditions of Approval:	Attached			
D . 10/5/14 D1 (505) 500 4045		And constructed the construction of the constr			
Date: 12/5/14 Phone: (505) 599-4045					
Attach Additional Sheets If Necessary					





ConocoPhillips SE/NW, 1410' FNL & 1350' FWL LEASE NO. NMSF-077482 LATITUDE N 36.845028 SEC.06 TO30N R012W FORMATION FRG/FRS NGITUDE W OKING NO. 30-045-34242 HOLDER A 100 GOUNTY, NEW MEXICO NUMBER (505) 324-5170 108.141791 TRESPASSING