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.

1220 5. 5t. 1 failei.	5 51., 500.00 1 4, 1	Sa	nta re, Nivi 6/303	to the appro	oprime twitoeb bistrict office.
2614 39-20038	Proposed A		elow-Grade Tank hod Permit or Cl		RECEIVED By OCD at 11:13 am, Jan 27, 2015
	Type of action: Bo	elow grade tank regisermit of a pit or proposed to be a pit, below to diffication to an existence plan only submethod	stration osed alternative method r-grade tank, or propose sting permit/or registrat mitted for an existing pe	d alternative method ion ermitted or non-permi	tted pit, below-grade tank,
lease be advised nvironment. Nor	Instructions: Please subt that approval of this request do does approval relieve the ope	nes not relieve the opera	tor of liability should opera	ions result in pollution of	surface water, ground water or the authority's rules, regulations or ordinances.
1. Operator: Bur	lington Resources		OGRID#:	14538	
	PO BOX 4289, Farming				
	name: San Juan 28-6 Unit				
API Number:	3003920038	OCD	Permit Number:		
U/L or Qtr/Qtr	P (SESE) Section	11 Township 28	N Range <u>6W</u> Co	ounty: <u>Rio Arriba</u>	
	osed Design: Latitude <u>36.6</u>				
	: 🛛 Federal 🗌 State 🗌 Pri				
Temporary: Permanent Lined String-Rein	Unlined Liner type: Thick	n	□ LLDPE □ HDPE □	PVC Other	ons: Lx Wx D
Volume: Tank Construc Secondary Visible sid	de tank: Subsection I of 19 120 bbl stion material: Meta containment with leak detect dewalls and liner Visible nickness 45	Type of fluid: d ction ⊠ Visible sidev e sidewalls only □ O	valls, liner, 6-inch lift and ther		
4. Alternative Submittal of as		ed. Exceptions must b	e submitted to the Santa F	e Environmental Bureau	a office for consideration of approval.
Chain link		ds of barbed wire at top	(Required if located with		nent residence, school, hospital,

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)					
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					
**Examination of the following is requested, if not leave blank: Variances and Exceptions: Variances and Exceptions: Variance 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. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC <u>Instructions: The applicant must demonstrate compliance for each siting criteria below in the application.</u> Recommendations of accep material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	table source				
General siting					
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	☐ Yes ☒ No ☐ NA				
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	☐ Yes ☐ No				
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	☐ Yes ☐ No				
 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				
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No				
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). - Topographic map; Visual inspection (certification) of the proposed site	☐ 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;. 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 application.	☐ Yes ☐ No				
 Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	0				
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	☐ 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. - 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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the deattached. 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 Design Plan - based upon the appropriate requirements of 19.15.17.12 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 Previously Approved Design (attach copy of design) API Number: or Permit Number: or Permit Number:	9 NMAC 9.15.17.9 NMAC
11. 12. 13. 14. 15. 16. 17. 18. 18. 18. 18. 19. 19. 19. 19	
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 datached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Departing 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 1 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:	9.15.17.9 NMAC
☐ Fieviously Approved Design (attach copy of design) /// Fitamost.	

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 de-	ocuments are
### 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 ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
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 Floral 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	uid Management Pit
Alternative Closure Method	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a 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	ittached 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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. P. 19.15.17.10 NMAC for guidance.	ce material are lease 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	☐ Yes ☐ No ☐ 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	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 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
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ 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	

Written confirmation or verification from the municipality; 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						
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 19.15.17.13 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 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							
Operator Application Certification:	slief						
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and be Name (Print): Title:							
Name (Print): Title:							
Signature: Date:							
8							
e-mail address:							
e-mail address: Telephone:							
e-mail address: Telephone:							
e-mail address:							
e-mail address: Telephone:	Mar 30, 2015						
e-mail address: Telephone:	Mar 30, 2015 ng the closure report. not complete this						

Form C-144

Operator Closu	re Certification:		
I hereby certify to belief. I also cer	hat the information and attachments submitted with this closur tify that the closure complies with all applicable closure requir	e report is true, ac ements and condit	curate and complete to the best of my knowledge and ions specified in the approved closure plan.
Name (Print):	Kenny Davis	Title: <u>Sta</u>	ff Regulatory Technician
Signature:	To S	Date:	12/3/14
e-mail address:_	kenny.r.davis@conocophillips.com	Telephone:	505-599-4045

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

Lease Name: SJ 28-6 Unit 136

API No.: 3003920038

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.

9. 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.



May 6, 2013

Lisa Hunter
ConocoPhillips
San Juan Business Unit
Office 214-4
5525 Hwy 64
Farmington, New Mexico 87401

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

> Durango, Colorado 970-403-3084

RE: Below Grade Tank Closure Report

San Juan 28-6 #136

Rio Arriba County, New Mexico

Dear Ms. Hunter:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) San Juan 28-6 #136, located in Rio Arriba 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 – San Juan 28-6 #136

Legal Description – SE¼ SE¼, Section 11, T28N, R6W, Rio Arriba County, New Mexico

Well Latitude/Longitude – N36.67125 and W107.43105, respectively

BGT Latitude/Longitude – N36.67099 and W107.43105, respectively

Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, April 2013

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a C-144 form dated May 1991 for the San Juan 28-6 #136 reported the depth to groundwater as greater than 100 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 (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 greater than 100 feet bgs. An unnamed wash, which discharges to Fourmile Canyon, is located approximately 620 feet southwest of the location. Based on this information, the location was assessed a ranking score of 10.

1.3 BGT Closure Assessment

AES was initially contacted by Bruce Yazzie, CoP representative, on April 12, 2013, and on April 15, 2013, Kelsey Christiansen and Corwin Lameman 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 April 15, 2013, 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 VOCs and 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 ranged from 0.5 ppm in S-5 up to 1.2 ppm in S-1. Field TPH concentrations ranged from less than 20.0 mg/kg in S-3 through S-5 up to 54.4 mg/kg in S-2. The field chloride concentration in SC-1 was 40 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
San Juan 28-6 #136 BGT Closure. April 2013

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Action I	evel (NMAC 19.	15.17.13E)		100	250
S-1	04/15/13	0.5	1.2	24.3	NA
S-2	04/15/13	0.5	1.0	54.4	NA
S-3	04/15/13	0.5	0.9	<20.0	NA
S-4	04/15/13	0.5	0.7	<20.0	NA
S-5	04/15/13	0.5	0.5	<20.0	NA
SC-1	04/15/13	0.5	0.8	NA	40

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 below the laboratory detection limit of 30 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 San Juan 28-6 #136 BGT Closure. April 2013

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
	Level (NMAC 19.15	.17.13E)	0.2	50	1	00	250
SC-1	04/15/13	0.5	<0.050	<0.25	NA	NA	<30

NA - not analyzed

3.0 Conclusions and Recommendations

Lelay Chrodium

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 the highest concentration reported in S-2 with 54.4 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the San Juan 28-6 #136.

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

Sincerely,

Kelsey Christiansen Environmental Scientist

Lisa Hunter San Juan 28-6 #136 BGT Closure Report May 6, 2013 Page 5 of 5

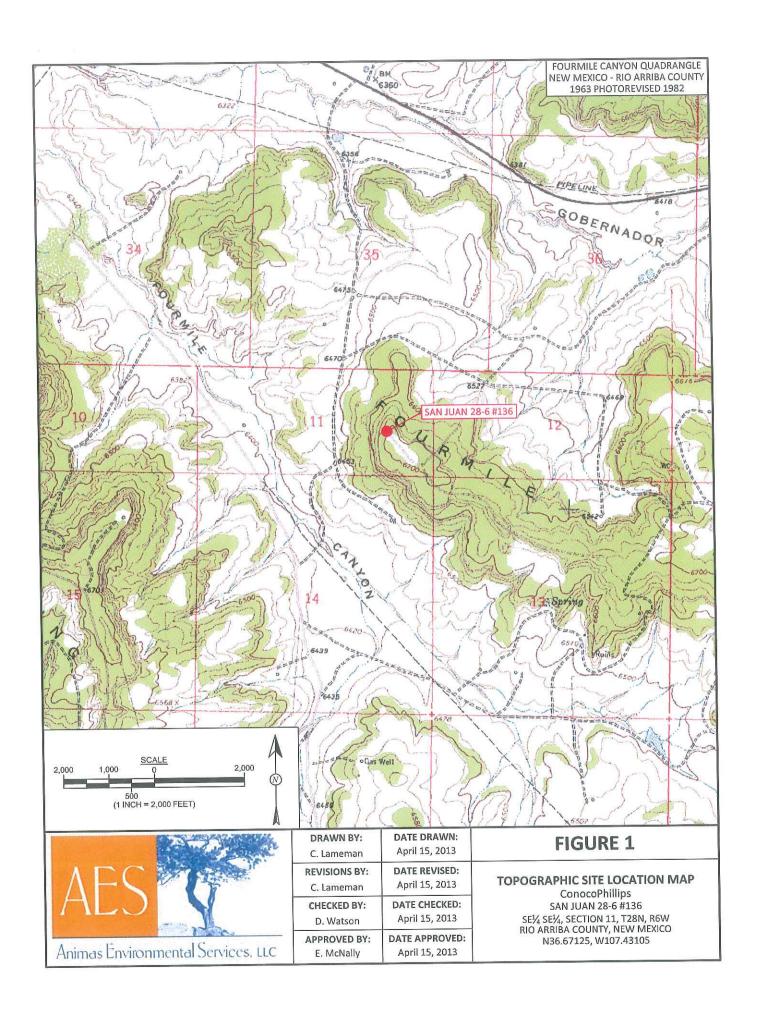
Elizabeth V MiNelly

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, April 2013 AES Field Screening Report 041513 Hall Analytical Report 1304617

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\SJ 28-6 #136\SJ 28-6 #136 BGT Closure Report 050613.docx



LEGEND

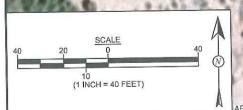
SAMPLE LOCATIONS

	Field Scre	ening R	esults	
Sample ID	Date	OVM- PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACT	ION LEVEL	-	100	250
S-1	4/15/13	1.2	24.3	NA
S-2	4/15/13	1.0	54.4	NA
S-3	4/15/13	0.9	<20.0	NA
S-4	4/15/13	0.7	<20.0	NA
S-5	4/15/13	0.5	<20.0	NA
SC-1	4/15/13	0.8	NA	40

		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 ACT	ION LEVEL	0.2	50	10	00	250
SC-1	4/15/13	<0.050	<0.25	NA	NA	<30

UAN 28-6 #136 WELL MONUMENT





Animas Environmental Services, LLC

AERIAL	SOURCE: © 2012 MICE	ROSOFT CORPORATION - AVAILAB	LE EXCLUSIVELY BY DIGITALGLOBE
E .	DRAWN BY: C. Lameman	DATE DRAWN: April 15, 2013	FIGURE
	REVISIONS BY: C. Lameman	DATE REVISED: April 15, 2013	AERIAL SITE M APRIL 2013

D. Watson	April 15, 2013
CHECKED BY:	DATE CHECKED:
C. Lamernan	

APPROVED BY: E. McNally

DATE APPROVED: April 15, 2013

GURE 2

AL SITE MAP RIL 2013

ConocoPhillips SAN JUAN 28-6 #136 SE¼ SE¼, SECTION 11, T28N, R6W RIO ARRIBA COUNTY, NEW MEXICO N36.67125, W107.43105

AES Field Screening Report

Client: ConocoPhillips

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

Durango, Colorado 970-403-3084

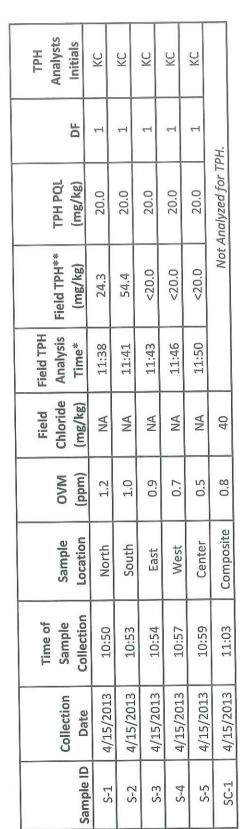
Animas Environmental Services. LLC

www.animasenvironmental.com

Project Location: SJ 28-6 #136

Date: 4/15/2013

Matrix: Soil



Practical Quantitation Limit PQL Not Detected at the Reporting Limit 9

Not Analyzed AN Dilution Factor

*Field TPH concentrations recorded may be below PQL.

Total Petroleum Hydrocarbons - USEPA 418.1 Analyst: Silver Nitrate

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with



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

April 18, 2013

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

FAX

RE: San Juan 28-6 #136

OrderNo.: 1304617

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 4/16/2013 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

andyl

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report Lab Order 1304617

Date Reported: 4/18/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services

San Juan 28-6 #136

Project:

Matrix: MEOH (SOIL) Lab ID: 1304617-001

Collection Date: 4/15/2013 11:03:00 AM Received Date: 4/16/2013 9:51:00 AM

Client Sample ID: SC-1

Analyses	Result	RL Qu	DF	Date Analyzed			
EPA METHOD 8021B: VOLATILES					Analyst: NSB		
Benzene	ND	0.050	mg/Kg	1	4/17/2013 2:35:34 PM		
Toluene	ND	0.050	mg/Kg	1	4/17/2013 2:35:34 PM		
Ethylbenzene	ND	0.050	mg/Kg	1	4/17/2013 2:35:34 PM		
Xylenes, Total	ND	0.10	mg/Kg	1	4/17/2013 2:35:34 PM		
Surr: 4-Bromofluorobenzene	110	80-120	%REC	1	4/17/2013 2:35:34 PM		
EPA METHOD 300.0: ANIONS					Analyst: JRR		
Chloride	ND	30	mg/Kg	20	4/16/2013 1:07:07 PM		

Qualifiers:

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

- 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
- Spike Recovery outside accepted recovery limits Page 1 of 3

OC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1304617

18-Apr-13

Client:

Animas Environmental Services

Project:

San Juan 28-6 #136

Sample ID MB-6995

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 6995

RunNo: 9920

SPK value SPK Ref Val %REC LowLimit

Prep Date: 4/16/2013 Analysis Date: 4/16/2013 PQL

SeqNo: 282273

Units: mg/Kg

HighLimit

%RPD **RPDLimit**

Qual

Analyte Chloride

Result

ND 1.5

SampType: LCS

TestCode: EPA Method 300.0: Anions

Sample ID LCS-6995 Client ID: LCSS

Batch ID: 6995

RunNo: 9920

Prep Date:

4/16/2013

Analysis Date: 4/16/2013

Result

14

SPK value SPK Ref Val %REC

5.518

5.518

SeqNo: 282274

Units: mg/Kg

110

%RPD

%RPD

Qual

Qual

Qual

SPK value SPK Ref Val PQL

15.00

15.00

15.00

%REC LowLimit

HighLimit

RPDLimit

Analyte Chloride

SampType: MS

TestCode: EPA Method 300.0: Anions

Client ID:

Sample ID 1304573-001AMS BatchQC

Batch ID: 6995

RunNo: 9920

Units: mg/Kg

Prep Date:

4/16/2013

Analysis Date: 4/16/2013 PQL

1.5

SeqNo: 282277

87.6

HighLimit

RPDLimit

Analyte Chloride

19

Result

19

7.5 SampType: MSD

TestCode: EPA Method 300.0: Anions

Client ID: BatchQC

Batch ID: 6995

RunNo: 9920

64.4

LowLimit

64.4

117

Prep Date: Analyte

Chloride

4/16/2013

Sample ID 1304573-001AMSD

Analysis Date: 4/16/2013

PQL

7.5

SeqNo: 282278

86.7

Units: mg/Kg

117

SPK value SPK Ref Val %REC LowLimit

%RPD HighLimit

0.718

RPDLimit

20

Qualifiers:

Value exceeds Maximum Contaminant Level.

Value above quantitation range E

Analyte detected below quantitation limits

P Sample pH greater than 2

RL Reporting Detection Limit В Analyte detected in the associated Method Blank

Holding times for preparation or analysis exceeded Η

Not Detected at the Reporting Limit ND

R

S Spike Recovery outside accepted recovery limits

RPD outside accepted recovery limits

Page 2 of 3

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1304617

18-Apr-13

Client:

Animas Environmental Services

1.1

Project:

San Juan 28-6 #136

Project: San Jua	11 20-0 #130													
Sample ID MB-7007	SampTy	pe: MB	LK	Test	TestCode: EPA Method 8021B: Volatiles									
Client ID: PBS	Batch	ID: R9 9	931	R										
Prep Date: 4/16/2013	Analysis Da	ate: 4/1	17/2013	S	eqNo: 28	33429	Units: mg/K	g						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Benzene	ND	0.050												
Toluene	ND	0.050												
Ethylbenzene	ND	0.050												
Xylenes, Total	ND	0.10												
Surr: 4-Bromofluorobenzene	1.1		1.000		106	80	120							
Sample ID LCS-7007	SampTy	ype: LC	s	Tes	tCode: El	PA Method	8021B: Vola	tiles						
Client ID: LCSS	Batch	ID: R9	931	F	RunNo: 9									
Prep Date: 4/16/2013	Analysis Da	ate: 4/	17/2013	8	SeqNo: 2	83430	Units: mg/k	(g						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Benzene	1.0	0.050	1.000	0	100	80	120							
Toluene	1.0	0.050	1.000	0	101	80	120							
Ethylbenzene	0.99	0.050	1.000	0	99.3	80	120							
Xylenes, Total	3.0	0.10	3.000	0	98.7	80	120							
			1000000		445	00	400							

1.000

115

Qualifiers:

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

Surr: 4-Bromofluorobenzene

RL Reporting Detection Limit

B Analyte detected in the associated Method Blank

120

80

- 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 3 of 3



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105 TEL: 505-345-3975 FAX: 505-345-4107

Sample Log-In Check List

Website: www.hallenvironmental.com RcptNo: 1 Animas Environmental Work Order Number: 1304617 Client Name: Received by/date: 4/16/2013 9:51:00 AM Lindsay Mangin Logged By: 4/16/2013 9:54:34 AM Completed By: **Lindsay Mangin** Reviewed By: 20 Chain of Custody Not Present No Yes | 1. Custody seals intact on sample bottles? No 🗆 Not Present Yes V 2. Is Chain of Custody complete? Courier 3. How was the sample delivered? Log In NA 🗆 No Yes 🗸 4. Was an attempt made to cool the samples? NA 🗆 Yes 🗸 No 🗌 5. Were all samples received at a temperature of >0° C to 6.0°C No 🗌 Yes V 6. Sample(s) in proper container(s)? No 🗌 Yes 🗸 7. Sufficient sample volume for indicated test(s)? No 🗌 Yes V 8. Are samples (except VOA and ONG) properly preserved? NA [] No W Yes 9. Was preservative added to bottles? No VOA Vials Yes No \square 10. VOA vials have zero headspace? Yes No V 11. Were any sample containers received broken? # of preserved bottles checked for pH: Yes 🗸 No 🗆 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? Yes 🗸 No L 13. Are matrices correctly identified on Chain of Custody? Yes V No 🗆 14. Is it clear what analyses were requested? No 🗆 Checked by: Yes 🗸 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) NA V No 🔲 Yes 16. Was client notified of all discrepancies with this order? Date: Person Notified: eMail Phone Fax In Person Via: By Whom: Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp % Condition Sea Intact Sea No Seal Date

1.0

Good

ANALYSIS LABORATORY www.hallenvironmental.com kins NE - Albuquerque, NM 87109 45-3975 Fax 505-345-4107 Analysis Request				(p	30O.	: 7	A0	V-In	8081 Pest 8270 (Sen (Al ov	×						onccophillips	Wo: 10338440	Activity code: Cloc	the motoring on the analytical report		
HALL ENV	ANALYSIS	www.hallenvironmental.com	4901 Hawkins NE - Albuque	Tel 505-345-3975 Fax	Ana	P(O)	(Gas o	(1.) (1.) (1.)	18 204 418 418	B (C nod nod 10 c	BTEX + M TPH 8015 TPH (Meth EDB (Meth PAH's (83 RCRA 8 M							Remarks: Bill to Conco	: Courtes Rey	Area LEVALE USENTO: BENALE CASAS BY: PARENTAIN	CONTROL OF THE PROPERTY AND
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and the same of th	Client: Animas Environmental		Mailing Address: 1.7 4 5 / and relie		120 510 1200 60 + O	7	QA/QC Package:		□ NELAP □ Other □	□ EDD (Type)	Date Time Matrix Sample Request ID	4-15-73 162 Suil SC-1						Date: Time: Rejinquished by:	1-5-12 16-44 / WATER - 24-1	Time: Relinquisited by:	13 1110 Missing Courtes Xg

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

State of New Mexico Energy Minerals and Natural Resources

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

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

Form C-141 Revised October 10, 2003

side of form

Release Notification and Corrective Action

			14016	ase I votilie	(OPERAT	OR		☐ Initia	ıl Report	☐ Final R	teport				
Name of Co	mnany Ru	rlington Res	ources			Contact Kenny Davis										
Address 340	11 East 30 th	St. Farming	ton, NM		Т	Telephone No.(505) 599-4045										
Facility Nan					F	Facility Type: Gas Well										
				3.61 1.6	. 173											
Surface Own	ner Feder	al		Mineral C	wner F	ederai			Lease IV	10. 14141-034	173					
						OF REI										
Unit Letter	Section	Township	Range	Feet from the	Second American Company	South Line	Feet from the	220-10052 100	/estLine	County Rio Arriba	n					
Latitude 36.67133000 Longitude 107.43065000																
NATURE OF RELEASE Volume of Release RGT Closure Summary Volume of Release N/A Volume Recovered N/A																
		losure Summa	ary				lour of Occurrence	e N/A		Hour of Disc						
Source of Re Was Immedi						If YES, To		0 1 1/11	Date and	11001 012210		1				
was immedi	ate Notice C		Yes] No ⊠ Not R	equired	N/A										
By Whom? N	V/A					Date and I										
Was a Water		ched?					olume Impacting	the Wate	ercourse.							
N/	A		∐ Ye	s 🛛 No		N/A										
N/A Describe Car N/A Describe Are BGT Closu	use of Probl ea Affected ure: NO RE		dial Action Action Ta	on Taken.* aken.* N REMOVAL												
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						OIL CONSERVATION DIVISION										
Signature:		Le	>													
Printed Nan	ne: Kenny	Davis			i	Approved b	y District Supervi	sor:			· ·					
Title: Staff						Approval D	ate:		Expiration	n Date:						
E-mail Add	ress: Kenny	r.davis@con	ocophillip	os.com		Conditions	of Approval:			Attached	d 🔲					
Doto: 12/3	2/1/1 Phone	e: (505) 599 ₋ 4	045		1											

* Attach Additional Sheets If Necessary



