

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

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

Form C-144
Revised June 6, 2013

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.

12746
45-35109

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

RECEIVED
By OCD 3-4-15

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

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

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

1.
Operator: ConocoPhillips Company ✓ OGRID #: 217817 ✓
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: Heaton Com A 100S ✓
API Number: 30-045-35109 ✓ OCD Permit Number: _____
U/L or Qtr/Qtr C (NENW) ✓ Section 30 ✓ Township 31N ✓ Range 11W ✓ County: San Juan
Center of Proposed Design: Latitude 36.87605100 °N ✓ Longitude -108.03436200 °W ✓ NAD: ☒ 1927 ☐ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment **OCD NAD83 36.87606 108.03502**

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

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: Produced Water
Tank Construction material: Metal
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness 45 mil ☐ HDPE ☐ PVC ☒ Other LLDPE

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

5.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify _____

6.

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

- ☐ Screen ☐ Netting ☐ Other _____
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

8.

Variances and Exceptions:

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

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

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

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

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

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

- ☐ 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

☐ Yes ☐ No
☒ NA

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

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

☐ Yes ☒ No

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.

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

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

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

10.

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

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

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

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

11.

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

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

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

- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including 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.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☒ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

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

15.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

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

| | |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | <input type="checkbox"/> Yes <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance | |

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

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

☐ Yes ☐ No

Within 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 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

Operator Application Certification:

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.

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

OCD Representative Signature: _____ Approval Date: Apr 24, 2015

Title: Environmental Specialist _____ OCD Permit Number: _____

19.

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

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

☒ Closure Completion Date: 9/25/13

20.

Closure Method:

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

21.

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

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

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

Operator Closure Certification:

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

Name (Print): Kenny Davis Title: Staff Regulatory Technician

Signature:  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
(Without Reclamation)

Lease Name: Heaton Com A 100S

API No.: 30-045-35109

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:
- Operator's name
 - 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 will be 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 be 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 an 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 will be 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 within the 60 day time frame.



Animas Environmental Services, LLC

www.animasenvironmental.com

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

Durango, Colorado
970-403-3084

November 13, 2013

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

Via electronic mail to:

SJBUE-Team@ConocoPhillips.com

**RE: Below Grade Tank Closure Report
Heaton Com A #100S
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) Heaton Com A #100S, 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 – Heaton Com A #100S

Legal Description – NE¼ NW¼, Section 30, T31N, R11W, San Juan County, New Mexico

Well Latitude/Longitude – N36.87606 and W108.03502, respectively

BGT Latitude/Longitude – N36.87578 and W108.03513, respectively

Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, September 2013

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 20 based on the following factors:

- **Depth to Groundwater:** A Form C-144 form dated February 2010 reported the depth to groundwater as between 50 and 99 feet below ground surface (bgs). (10 points)
- **Wellhead Protection Area:** The tank location is not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** Estes Arroyo, which discharges to the Animas River, is located approximately 450 feet east of the location. (10 points)

1.3 BGT Closure Assessment

AES was initially contacted by Bruce Ashcroft, CoP representative, on September 25, 2013, and on September 26, 2013, Stephanie Lynn and Jesse Christopherson 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 September 26, 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:

- 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 reported as 0.0 ppm in all samples. Field TPH concentrations ranged from 37.9 mg/kg in S-2 up to 43.3 mg/kg in S-3 and S-4. The field chloride concentration in SC-1 was 60 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
Heaton Com A #100S BGT Closure, September 2013

| <i>Sample ID</i> | <i>Date Sampled</i> | <i>Depth below BGT (ft)</i> | <i>VOCs OVM Reading (ppm)</i> | <i>Field TPH (418.1) (mg/kg)</i> | <i>Field Chlorides (mg/kg)</i> |
|---|---------------------|-----------------------------|-------------------------------|----------------------------------|--------------------------------|
| NMOCD Action Level (NMAC 19.15.17.13E) | | | -- | 100 | 250 |
| S-1 | 9/26/13 | 0.5 | 0.0 | 42.0 | NA |
| S-2 | 9/26/13 | 0.5 | 0.0 | 37.9 | NA |
| S-3 | 9/26/13 | 0.5 | 0.0 | 43.3 | NA |
| S-4 | 9/26/13 | 0.5 | 0.0 | 43.3 | NA |
| S-5 | 9/26/13 | 0.5 | 0.0 | 39.3 | NA |
| SC-1 | 9/26/13 | 0.5 | 0.0 | NA | 60 |

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
Heaton Com A #100S BGT Closure, September 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) |
|--|--------------|------------|-----------------|--------------------|-----------------|-----------------|-------------------|
| NMOCD Action Level (NMAC 19.15.17.13E) | | | 0.2 | 50 | 100 | | 250 |
| SC-1 | 9/26/13 | 0.5 | <0.050 | <0.25 | NA | NA | <30 |

NA - Not Analyzed

3.0 Conclusions and Recommendations

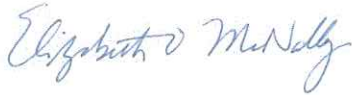
NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentrations reported in S-3 and S-4 with 43.3 mg/kg. Benzene and total BTEX concentrations in SC-1 were 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 Heaton Com A #100S.

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

Sincerely,



David Reese
Environmental Scientist

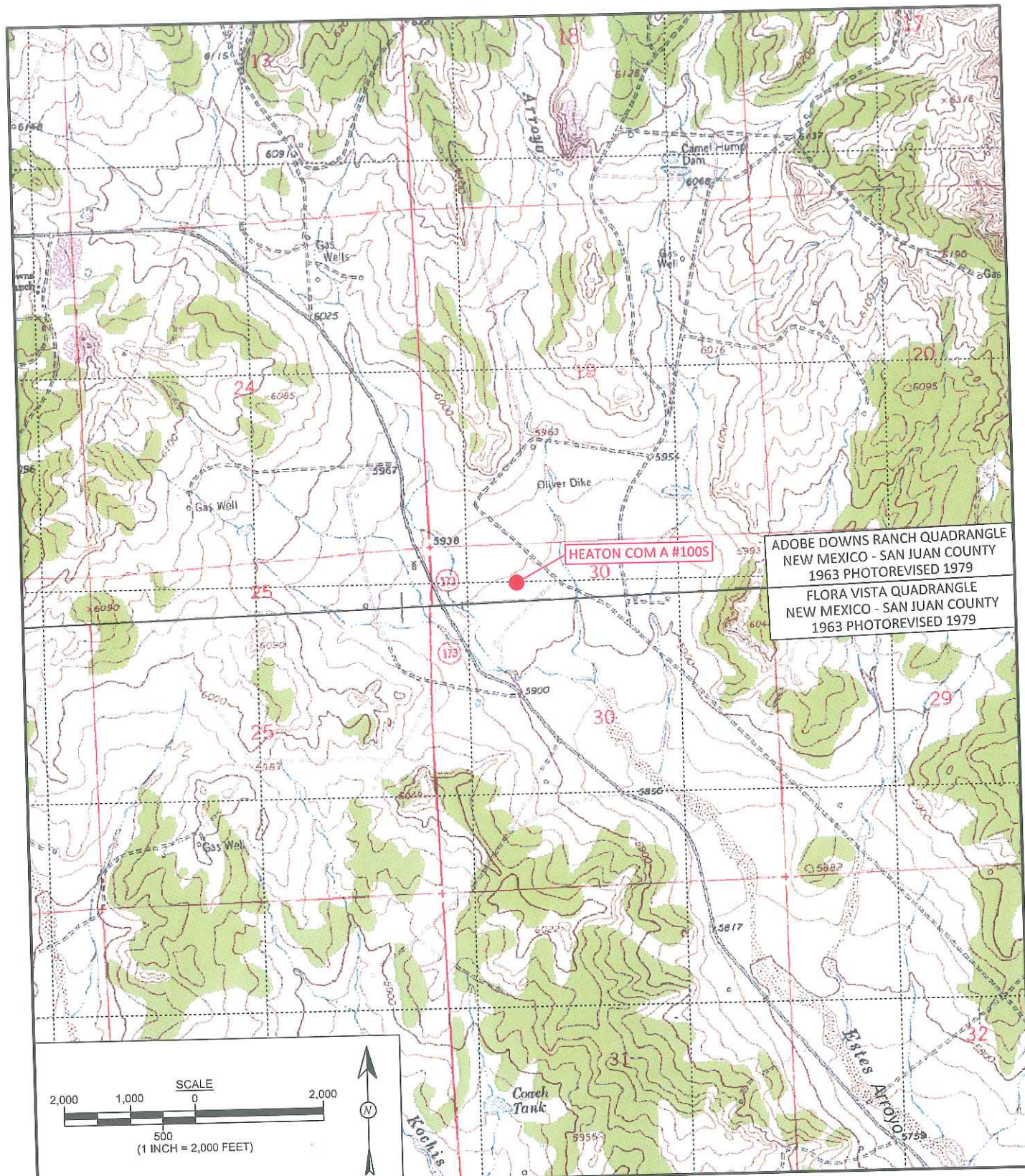


Elizabeth McNally, P.E.

Attachments:

- Figure 1. Topographic Site Location Map
- Figure 2. Aerial Site Map, September 2013
- AES Field Screening Report 092613
- Hall Analytical Report 1309D29

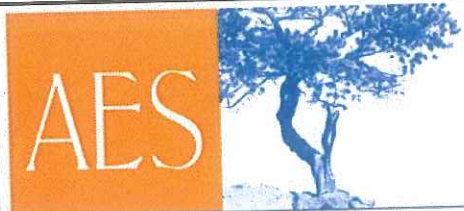
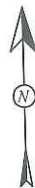
R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\Heaton Com A #100S\Heaton Com A #100S BGT Closure Report 111313.docx



ADOBE DOWNS RANCH QUADRANGLE
NEW MEXICO - SAN JUAN COUNTY
1963 PHOTOREVISED 1979
FLORA VISTA QUADRANGLE
NEW MEXICO - SAN JUAN COUNTY
1963 PHOTOREVISED 1979

HEATON COM A #100S

2,000 1,000 0 2,000
SCALE
500
(1 INCH = 2,000 FEET)



Animas Environmental Services, LLC

| | |
|-----------------------------|--------------------------------------|
| DRAWN BY: S. Glasses | DATE DRAWN: September 27, 2013 |
| REVISIONS BY: C. Lameman | DATE REVISED: September 27, 2013 |
| CHECKED BY: D. Watson | DATE CHECKED: September 27, 2013 |
| APPROVED BY: E. McNally | DATE APPROVED: September 27, 2013 |

FIGURE 1

TOPOGRAPHIC SITE LOCATION MAP
ConocoPhillips
HEATON COM A #100S
NE¼, NW¼, SECTION 30, T31N, R11W
SAN JUAN COUNTY, NEW MEXICO
N36.87606, W108.03502

LEGEND

● SAMPLE LOCATIONS

Field Screening Results

| Sample ID | Date | OVM-PID (ppm) | TPH (mg/kg) | Chlorides (mg/kg) |
|--------------------|---------|---------------|-------------|-------------------|
| NMOCD ACTION LEVEL | | -- | 100 | 250 |
| S-1 | 9/26/13 | 0.0 | 42.0 | NA |
| S-2 | 9/26/13 | 0.0 | 37.9 | NA |
| S-3 | 9/26/13 | 0.0 | 43.3 | NA |
| S-4 | 9/26/13 | 0.0 | 43.3 | NA |
| S-5 | 9/26/13 | 0.0 | 39.3 | NA |
| SC-1 | 9/26/13 | 0.0 | NA | 60 |

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

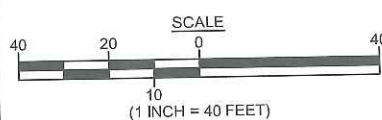
Laboratory Analytical Results

| 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 | 100 | | 250 |
| SC-1 | 9/26/13 | <0.050 | <0.25 | NA | NA | <30 |

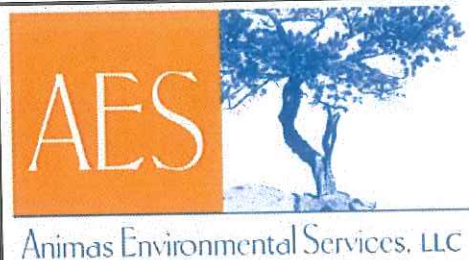
SAMPLE WAS ANALYZED PER EPA METHOD 8021B AND 300.0.

HEATON COM A 100S WELL MONUMENT

BGT - N36.87578
W108.03513



AERIAL SOURCE: © 2012 GOOGLE EARTH, AERIAL DATE: JUNE 10, 2011



| | |
|-----------------------------|--------------------------------------|
| DRAWN BY: S. Glasses | DATE DRAWN: September 27, 2013 |
| REVISIONS BY: S. Glasses | DATE REVISED: September 27, 2013 |
| CHECKED BY: D. Watson | DATE CHECKED: September 27, 2013 |
| APPROVED BY: E. McNally | DATE APPROVED: September 27, 2013 |

FIGURE 2

**AERIAL SITE MAP
BELOW GRADE TANK CLOSURE
SEPTEMBER 2013**
ConocoPhillips
HEATON COM A #100S
NE¼, NW¼, SECTION 30, T31N, R11W
SAN JUAN COUNTY, NEW MEXICO
N36.87606, W108.03502

AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

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

Durango, Colorado
970-403-5084

Client: ConocoPhillips

Project Location: Heaton Com A #100S

Date: 9/26/2013

Matrix: Soil

| Sample ID | Collection Date | Time of Sample Collection | Sample Location | OVM (ppm) | Field Chloride (mg/kg) | Field TPH Analysis Time | Field TPH* (mg/kg) | TPH PQL (mg/kg) | DF | TPH Analysts Initials |
|-----------|-----------------|---------------------------|-----------------|-----------|------------------------|-------------------------|--------------------|-----------------|----|-----------------------|
| S-1 | 9/26/2013 | 8:37 | North | 0.0 | NA | 9:18 | 42.0 | 20.0 | 1 | SL |
| S-2 | 9/26/2013 | 8:38 | South | 0.0 | NA | 9:22 | 37.9 | 20.0 | 1 | SL |
| S-3 | 9/26/2013 | 8:39 | East | 0.0 | NA | 9:26 | 43.3 | 20.0 | 1 | SL |
| S-4 | 9/26/2013 | 8:40 | West | 0.0 | NA | 9:30 | 43.3 | 20.0 | 1 | SL |
| S-5 | 9/26/2013 | 8:41 | Center | 0.0 | NA | 9:33 | 39.3 | 20.0 | 1 | SL |
| SC-1 | 9/26/2013 | 8:45 | Composite | 0.0 | 60 | Not Analyzed for TPH. | | | | |

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with

DF Dilution Factor

Silver Nitrate

Total Petroleum Hydrocarbons - USEPA 418.1

NA Not Analyzed

ND Not Detected at the Reporting Limit

PQL Practical Quantitation Limit

*Field TPH concentrations recorded may be below PQL.

Analyst:

Stephanie Lynn



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

October 01, 2013

Debbie Watson

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

RE: CoP Heaton Com A #100S

OrderNo.: 1309D29

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 9/27/2013 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. In order to properly interpret your results it is imperative that you review this report in its entirety. 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. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. 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.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1309D29

Date Reported: 10/1/2013

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** Animas Environmental**Client Sample ID:** SC-1**Project:** CoP Heaton Com A #100S**Collection Date:** 9/26/2013 8:45:00 AM**Lab ID:** 1309D29-001**Matrix:** MEOH (SOIL)**Received Date:** 9/27/2013 10:00:00 AM

| Analyses | Result | RL | Qual | Units | DF | Date Analyzed | Batch |
|------------------------------------|--------|--------|------|-------|----|-----------------------|--------------|
| EPA METHOD 8021B: VOLATILES | | | | | | | Analyst: NSB |
| Benzene | ND | 0.050 | | mg/Kg | 1 | 9/27/2013 11:22:53 AM | R13672 |
| Toluene | ND | 0.050 | | mg/Kg | 1 | 9/27/2013 11:22:53 AM | R13672 |
| Ethylbenzene | ND | 0.050 | | mg/Kg | 1 | 9/27/2013 11:22:53 AM | R13672 |
| Xylenes, Total | ND | 0.10 | | mg/Kg | 1 | 9/27/2013 11:22:53 AM | R13672 |
| Surr: 4-Bromofluorobenzene | 84.4 | 80-120 | | %REC | 1 | 9/27/2013 11:22:53 AM | R13672 |
| EPA METHOD 300.0: ANIONS | | | | | | | Analyst: JRR |
| Chloride | ND | 30 | | mg/Kg | 20 | 9/27/2013 1:00:35 PM | 9533 |

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

| | | |
|--------------------|---|---|
| Qualifiers: | * | Value exceeds Maximum Contaminant Level. |
| | E | Value above quantitation range |
| | J | Analyte detected below quantitation limits |
| | O | RSD is greater than RSDlimit |
| | R | RPD outside accepted recovery limits |
| | S | Spike Recovery outside accepted recovery limits |

| | |
|----|--|
| B | Analyte detected in the associated Method Blank |
| H | Holding times for preparation or analysis exceeded |
| ND | Not Detected at the Reporting Limit |
| P | Sample pH greater than 2 for VOA and TOC only. |
| RL | Reporting Detection Limit |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309D29

01-Oct-13

Client: Animas Environmental
Project: CoP Heaton Com A #100S

| | | | | | | | | | | |
|------------|-----------|----------------|-----------|-------------|--------------------------|----------|-----------|------|----------|------|
| Sample ID | MB-9533 | SampType: | MBLK | TestCode: | EPA Method 300.0: Anions | | | | | |
| Client ID: | PBS | Batch ID: | 9533 | RunNo: | 13695 | | | | | |
| Prep Date: | 9/27/2013 | Analysis Date: | 9/27/2013 | SeqNo: | 390297 | Units: | mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | ND | 1.5 | | | | | | | | |

| | | | | | | | | | | |
|------------|-----------|----------------|-----------|-------------|--------------------------|----------|-----------|------|----------|------|
| Sample ID | LCS-9533 | SampType: | LCS | TestCode: | EPA Method 300.0: Anions | | | | | |
| Client ID: | LCSS | Batch ID: | 9533 | RunNo: | 13695 | | | | | |
| Prep Date: | 9/27/2013 | Analysis Date: | 9/27/2013 | SeqNo: | 390298 | Units: | mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | 15 | 1.5 | 15.00 | 0 | 99.2 | 90 | 110 | | | |

| | | | | | | | | | | |
|------------|----------------|----------------|-----------|-------------|--------------------------|----------|-----------|------|----------|------|
| Sample ID | 1309901-008AMS | SampType: | MS | TestCode: | EPA Method 300.0: Anions | | | | | |
| Client ID: | BatchQC | Batch ID: | 9533 | RunNo: | 13695 | | | | | |
| Prep Date: | 9/27/2013 | Analysis Date: | 9/27/2013 | SeqNo: | 390333 | Units: | mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | 17 | 1.5 | 15.00 | 3.399 | 92.3 | 58.8 | 109 | | | |

| | | | | | | | | | | |
|------------|-----------------|----------------|-----------|-------------|--------------------------|----------|-----------|-------|----------|------|
| Sample ID | 1309901-008AMSD | SampType: | MSD | TestCode: | EPA Method 300.0: Anions | | | | | |
| Client ID: | BatchQC | Batch ID: | 9533 | RunNo: | 13695 | | | | | |
| Prep Date: | 9/27/2013 | Analysis Date: | 9/27/2013 | SeqNo: | 390334 | Units: | mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | 17 | 1.5 | 15.00 | 3.399 | 92.0 | 58.8 | 109 | 0.204 | 20 | |

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309D29

01-Oct-13

Client: Animas Environmental
Project: CoP Heaton Com A #100S

| Sample ID: 5ML RB | SampType: MBLK | TestCode: EPA Method 8021B: Volatiles | | | | | | | | |
|----------------------------|---------------------------------|--|-----------|-------------|------|----------|-----------|------|----------|------|
| Client ID: PBS | Batch ID: R13672 | RunNo: 13672 | | | | | | | | |
| Prep Date: | Analysis Date: 9/27/2013 | SeqNo: 389824 Units: mg/Kg | | | | | | | | |
| 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 | 0.96 | | 1.000 | | 96.1 | 80 | 120 | | | |

| Sample ID: 100NG BTEX LCS | SampType: LCS | TestCode: EPA Method 8021B: Volatiles | | | | | | | | |
|----------------------------------|---------------------------------|--|-----------|-------------|------|----------|-----------|------|----------|------|
| Client ID: LCSS | Batch ID: R13672 | RunNo: 13672 | | | | | | | | |
| Prep Date: | Analysis Date: 9/27/2013 | SeqNo: 389835 Units: mg/Kg | | | | | | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Benzene | 0.95 | 0.050 | 1.000 | 0 | 95.0 | 80 | 120 | | | |
| Toluene | 0.97 | 0.050 | 1.000 | 0 | 97.0 | 80 | 120 | | | |
| Ethylbenzene | 0.97 | 0.050 | 1.000 | 0 | 97.3 | 80 | 120 | | | |
| Xylenes, Total | 2.9 | 0.10 | 3.000 | 0 | 98.1 | 80 | 120 | | | |
| Surr: 4-Bromofluorobenzene | 1.1 | | 1.000 | | 105 | 80 | 120 | | | |

| Sample ID: 1309D29-001AMS | SampType: MS | TestCode: EPA Method 8021B: Volatiles | | | | | | | | |
|----------------------------------|---------------------------------|--|-----------|-------------|------|----------|-----------|------|----------|------|
| Client ID: SC-1 | Batch ID: R13672 | RunNo: 13672 | | | | | | | | |
| Prep Date: | Analysis Date: 9/27/2013 | SeqNo: 389853 Units: mg/Kg | | | | | | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Benzene | 0.74 | 0.050 | 0.7634 | 0 | 97.2 | 67.3 | 145 | | | |
| Toluene | 0.76 | 0.050 | 0.7634 | 0 | 99.9 | 66.8 | 144 | | | |
| Ethylbenzene | 0.78 | 0.050 | 0.7634 | 0 | 102 | 61.9 | 153 | | | |
| Xylenes, Total | 2.3 | 0.10 | 2.290 | 0 | 101 | 65.8 | 149 | | | |
| Surr: 4-Bromofluorobenzene | 0.76 | | 0.7634 | | 99.7 | 80 | 120 | | | |

| Sample ID: 1309D29-001AMSD | SampType: MSD | TestCode: EPA Method 8021B: Volatiles | | | | | | | | |
|-----------------------------------|---------------------------------|--|-----------|-------------|------|----------|-----------|------|----------|------|
| Client ID: SC-1 | Batch ID: R13672 | RunNo: 13672 | | | | | | | | |
| Prep Date: | Analysis Date: 9/27/2013 | SeqNo: 389862 Units: mg/Kg | | | | | | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Benzene | 0.72 | 0.050 | 0.7634 | 0 | 94.7 | 67.3 | 145 | 2.61 | 20 | |
| Toluene | 0.75 | 0.050 | 0.7634 | 0 | 98.5 | 66.8 | 144 | 1.43 | 20 | |
| Ethylbenzene | 0.76 | 0.050 | 0.7634 | 0 | 99.3 | 61.9 | 153 | 2.22 | 20 | |
| Xylenes, Total | 2.3 | 0.10 | 2.290 | 0 | 99.4 | 65.8 | 149 | 1.51 | 20 | |
| Surr: 4-Bromofluorobenzene | 0.75 | | 0.7634 | | 98.7 | 80 | 120 | 0 | 0 | |

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Project Name:

4901 Hawkins NE - Albuquerque, NM 87109

Tel 505-345-3975 Fax 505-345-4107

Project Manager:

D. Watson

| | |
|------------------|--|
| D. Watson | |
| Sampler: S. Lynn | |

Sampler: S. Lynn

[illegible]

Sample Temperature

| Container | Type and # |
|-----------|------------|
| 100 | |

2001-2002

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 | 89 | 90 | 91 | 92 | 93 | 94 | 95 | 96 | 97 | 98 | 99 | 100 |
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| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 | 89 | 90 | 91 | 92 | 93 | 94 | 95 | 96 | 97 | 98 | 99 | 100 |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|

[illegible][illegible]

100

[illegible]

Received by:

Received by:

17

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This service is not guaranteed and is subject to availability.

Remarks: Bill to Conoco Phillips

| | |
|-----------------------------|----------------------------|
| WO: 10351604 | User: Benale |
| Activity Code: C200 | Ordered by: Bruce Ashcroft |
| Supervisor: Sheldon Montoya | Area: Z |

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

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

| | |
|---|-------------------------------------|
| Name of Company ConocoPhillips Company ✓ | Contact Kenny Davis |
| Address 3401 East 30th St, Farmington, NM | Telephone No. (505) 599-4045 |
| Facility Name: Heaton Com A 100S ✓ | Facility Type: Gas Well |
| Surface Owner Federal ✓ | Mineral Owner Federal ✓ |
| Lease No. SF-078097 ✓ | |

LOCATION OF RELEASE


| | | | | | | | | |
|------------------------|---------------------|-----------------------|--------------------|----------------------------|---------------------------------|-----------------------------|------------------------------|--------------------------|
| Unit Letter C ✓ | Section 30 ✓ | Township 31N ✓ | Range 11W ✓ | Feet from the 481 ✓ | North/South Line North ✓ | Feet from the 1693 ✓ | East/West Line West ✓ | County San Juan ✓ |
|------------------------|---------------------|-----------------------|--------------------|----------------------------|---------------------------------|-----------------------------|------------------------------|--------------------------|

Latitude **36.87605100** Longitude **108.03436200**

NATURE OF RELEASE

| | | |
|--|---|---------------------------------------|
| Type of Release BGT Closure Summary | Volume of Release N/A | Volume Recovered N/A |
| Source of Release: NONE | Date and Hour of Occurrence N/A | Date and Hour of Discovery N/A |
| Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required | If YES, To Whom? N/A | |
| By Whom? N/A | Date and Hour N/A | |
| Was a Watercourse Reached? N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. N/A | |
| If a Watercourse was Impacted, Describe Fully.* N/A | | |
| Describe Cause of Problem and Remedial Action Taken.* N/A | | |
| Describe Area Affected and Cleanup Action Taken.* BGT Closure: NO RELEASE FOUND UPON REMOVAL | | |

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and 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 does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

| | | | |
|--|--|-----------------------------------|------------------|
| Signature:  | | <u>OIL CONSERVATION DIVISION</u> | |
| Printed Name: Kenny Davis | | Approved by District Supervisor: | |
| Title: Staff Regulatory Technician | | Approval Date: | Expiration Date: |
| E-mail Address: Kenny.r.davis@conocophillips.com | | Conditions of Approval: | |
| Date: 12/10/14 Phone: (505) 599-4045 | | Attached <input type="checkbox"/> | |

* Attach Additional Sheets If Necessary





HEATON COMA 100S
COP. 520. 131. RII
C. BLM.
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