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.

			Danta I V	c, 14141 67505	to the appropri	ate Title of Bistriet office.
	Propo	osed Alterna		-Grade Tank, Permit or Clo	<u>or</u> osure Plan Applic	eation
14295	or proposed alte	Permit of a	on to an existing p an only submitted	Iternative method tank, or proposed ermit/or registration for an existing per	mitted or non-permitted	
			AVAILABLE DE SANTO CONTRACTOR DE LA CONT		pit, below-grade tank or a	and another a
Please be advised to	that approval of this r	equest does not relie	eve the operator of lia	ability should operationly with any other an	ons result in pollution of sur	face water, ground water or the ority's rules, regulations or ordinances.
1.	does approvar reneve	the operator of its	responsibility to com	pry with any other up	pricable governmentar author	or o
Operator: Bu	ırlington Resources	Oil & Gas Compar	n <u>y, LP</u> OG	RID #: <u>14538</u>		
Address: Po	O BOX 4289, Farmi	ngton, NM 87499				
Facility or wel	l name: San Juan 29	9-7 Unit 101				
API Number:	30-039-20082		OCD Permit Numb	oer:		
					7 W County:]	
					<u>_</u> <u>W</u> NAD: □1927 ⊠	
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2,						
862	section F, G or J of	19.15.17.11 NMA	С			
	Drilling Work					
	The same of the sa		A ∏ Multi-Well F	luid Management	Low Chloride D	rilling Fluid 🗌 yes 🔲 no
A)					Other	
☐ String-Rein	150.50	2 	-: : : : : : : : : : : : : : : : : : :			
		tory Other		Volume:	_bbl Dimensions: L>	x W x D
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	120		fluid:Produ	iced Water		
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					nutomatic overflow shut-of	
8-8						
Liner type: Th	nickness	45mil	☐ HDPE ☐ PV	C OtherI	LLDPE	
4.	10202 138 12		9)			
Alternativ						
Submittal of a	n exception request	is required. Excep	otions must be subm	itted to the Santa Fe	Environmental Bureau of	fice for consideration of approval.
5.					200 20 20 12 12 12 12 12 12 12 12 12 12 12 12 12	
					nd below-grade tanks)	
Chain link, institution or a	1.50	wo strands of barbe	ed wire at top (Requ	ired if located within	n 1000 feet of a permaneni	residence, school, hospital,
		of barbed wire ever	nly 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 acceptate are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable 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	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (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.	☐ Yes ☐ No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ 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 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 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 19.1 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 15.17.9 NMAC
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 doc 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. 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	15.17.9 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 d	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.	id Managamant Dit
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fluck 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	and Management Pit
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	ttached to the
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 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	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality								
- WILLOW COMMINGUOUS OF VOTINGACION FROM the mannerpancy, Willow approval columned from the mannerpancy	☐ 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								
Within a 100-year floodplain.	Yes No							
- FEMÁ map	Yes No							
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 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:	deci vici							
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and bel	lief.							
Name (Print): Title:								
Signature: Date:								
e-mail address: Telephone:								
18. OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)								
19								
18. OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 04-06	6-2016 g the closure report.							
OCD Approval: Permit Application (including closure plan) Closure Plan (only) CCD Conditions (see attachment) OCD Representative Signature: Approval Date: 04-06 Title: Environmental Specialist OCD Permit Number: 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date: 2/23/2012	6-2016 g the closure report.							
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) Approval Date: O4-06 Title: Environmental Specialist OCD Permit Number: 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date: 2/23/2012	6-2016 g the closure report. at complete this							

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report is	
belief. I also certify that the closure complies with all applicable closure requirements and	1 conditions specified in the approved closure plan.
Name (Print): Larissa Farrell Title: Regulatory Tec	chnician
0	2 7 11
Signature: Tarvell	Date: $3-y-1$
e-mail address: <u>Larissa.L.Farrell@cop.com</u> Telephone: (505)326-9504	

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

Lease Name: San Juan 29-7 Unit 101

API No.: 30-039-20082

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.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

2. 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.

3. 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.

4. 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.

5. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. BR 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.

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). Form C-141 is 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 300.0	250		

6. 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.

7. 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.

- 8. 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 was not found.

9. 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 was not found.

10. 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.

11. 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.

12. 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.

- 13. 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)

<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

Form C-141 Revised August 8, 2011 Submit 1 Copy to appropriate District Office to accordance with 19.15.29 NMAC.

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

			Rele	ase Notifi	catio	n and Co	rrective A	ction				
						OPERA	ГOR		☐ Initia	al Report	\boxtimes	Final Report
Name of Co						Contact Crystal Walker						
Address 340					-		No.(505) 326-98	337		-		
Facility Nar	ne: San Ju	an 29-7 Uni	it 101	7-17-2-17-2		Гасинту Тур	e: Gas Well					
Surface Ow	ner Federa	ıl		Mineral (Owner				API No	.30-039-20	082	
				LOC	ATIO	N OF REI	LEASE					
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the		est Line	County		
В	07	29N	7W	990		North	1600	ŀ	East	Rio Arrib	a	
	Latitude <u>36.745088</u> Longitude <u>-107.608944</u>											
				NA'	FURE	OF REL	EASE					
Type of Rele						Volume of				Recovered		
Source of Re	lease					Date and I-	Iour of Occurrent	ce	Date and	Hour of Dis	covery	
Was Immedia	nte Notice G	liven?				If YES, To	Whom?					
			Yes	No 🛛 Not R	Required							
By Whom?						Date and I-						
Was a Water	course Reac		v . 121 a	To.		If YES, Vo	olume Impacting	the Wate	rcourse.			
			Yes 🛛 1									
If a Watercou	ırse was İmp	pacted, Descri	ibe Fully.	•								
N/A												
The state of the s		em and Remed										
No release w	as encount	ered during t	tne BGI	Closure.								
Describe Aus	a Affastad s	and Claanum /	Antion Tol	ran *		-						
N/A	a Amedica a	and Cleanup A	ACHOII Tai	ten. *								
I hereby certi	fy that the i	nformation gi	ven above	is true and com	plete to	the best of my	knowledge and u	ınderstar	nd that pur	suant to NM	OCD rı	ules and
regulations a	l operators	are required to	o report ai	nd/or file certain	release i	notifications a	nd perform corre	ctive acti	ons for rel	eases which	may er	ndanger
							arked as "Final R					
or the environ	operations n nment. In a	ave faffed to a ddition, NMC	idequatery CD accer	tance of a C-141	report of	does not reliev	on that pose a three the operator of	responsi	bility for c	ompliance v	vith any	other
		vs and/or regu			1		50		967	W.		
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Title: Regul	atory Tech	nician				Approval Da	te:]	Expiration	Date:		
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E-mail Address:Larissa.L.Farrell@cop.com Conditions of Approval: Attached												
Date: 2-24-2			(505) 326	-9504								
Attach Addi	tional Shee	ets If Necess	ary									



March 1, 2012

Ashley Maxwell San Juan Business Unit Office 216-2 Highway 64 Farmington, NM 87401 624 E. Comanche

Farmington, NM 87401 505-564-2281

> Durango, Colorado 970-403-3274

RE: San Juan 29-7 #101 Below Grade Tank Closure Report Rio Arriba County, New Mexico

Dear Ms. Cook-Cowden:

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 29-7 #101, 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 29-7 #101

Legal Description – NW¼ NE¾, Section 7, T29N, R7W, Rio Arriba County, New Mexico Well Latitude/Longitude – N36.74502 and W107.60880, respectively BGT Latitude/Longitude – N36.74511 and W107.60893, respectively Land Jurisdiction – Bureau of Land Management (BLM)

Figure 1 – Topographic Site Location Map

1.2 NMOCD Ranking

Figure 2 - General Site Map, February 2012

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) and New Mexico Office of the State Engineer (NMOSE) databases were reviewed. An NMOCD Cathodic Report dated 1991 indicated that groundwater was at 110 feet below ground surface (bgs). No registered water wells were reported within 1,000 ft of the well location based on data from the NMOSE database. Once on site, AES personnel verified the ranking using known information of the area, 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; distance to the nearest surface water was greater than 1,000 feet; and the location is not within

a well-head protection area. Gobernador Canyon is located approximately one to the northwest. The site was assessed a NMOCD ranking of zero.

1.3 BGT Closure Assessment

AES was initially contacted by Sheldon Montoya, CoP representative, on February 9, 2012, and on the same day, Corwin Lameman and Deborah Watson of AES met with Bruce Ashcroft at the location.

AES personnel collected six soil samples from the 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 February 9, 2012, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5 point composite (SC-1) from below the BGT. Soil samples S-1 through S-5 were collected from approximately 6 inches below the former BGT for field screening of volatile organic compounds (VOCs), total petroleum hydrocarbon (TPH), and chlorides. Soil sample SC-1 was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Soil 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 samples were field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Soil Laboratory Analyses

The soil sample SC-1 collected for laboratory analysis was placed into new, clean, laboratory-supplied containers, which were then labeled, placed on ice, and logged onto a sample chain of custody record. Samples were 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 Soil Field and Laboratory Analytical Results

Field screening for VOCs via OVM showed readings ranging from 2.0 ppm in S-1 up to 10.9 ppm in S-5. Field TPH concentrations ranged from below detection limit of 20 mg/kg in S-1 and S-3 up to 37.6 mg/kg in S-5. Field chlorides were 40 mg/kg for all samples. 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 29-7 #101 BGT Closure. February 2012

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Acti	on Level (NMA	AC 19.15.17.13E)		100	250
S-1	2/09/12	0.5	2.0	<20.0	40
S-2	2/09/12	0.5	9.2	27.0	40
S-3	2/09/12	0.5	8.5	<20.0	40
S-4	2/09/12	0.5	8.2	23.0	40
S-5	2/09/12	0.5	10.9	37.6	NA

NA = not analyzed

Laboratory analytical results showed that the benzene and total BTEX concentrations in SC-1 were less than 0.050 mg/kg and less than 0.25 mg/kg, respectively. The laboratory chloride concentration was 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 29-7 #101 BGT Closure, February 2012

Sample ID	Date Sampled	Date Sampled Depth (ft)		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	10	00	250	
SC-1	2/09/12	0.5	<0.050	<0.25	NA	NA	<30	

NA = not analyzed

3.0 Conclusions

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Benzene concentrations in SC-1 were below the laboratory detection limit of 0.050 mg/kg, and total BTEX concentrations were below the NMOCD action level of 50 mg/kg in SC-1. Field TPH concentrations were below the NMOCD action level of 100 mg/kg in all samples. Chloride concentrations for all samples were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, BTEX, TPH, and chlorides, no further work is recommended.

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

Sincerely,

Deborah Watson, Geologist

Elizabeth V McNelly

Debrah Water

Project Manager

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map

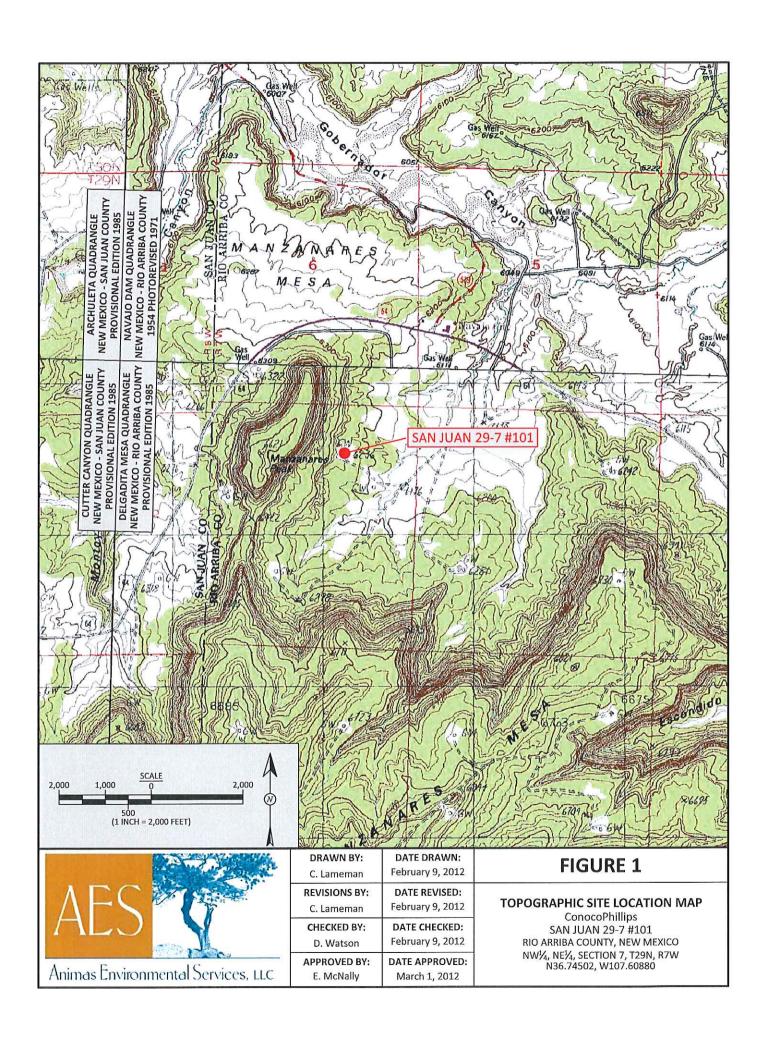
Figure 2. General Site Map, February 2012

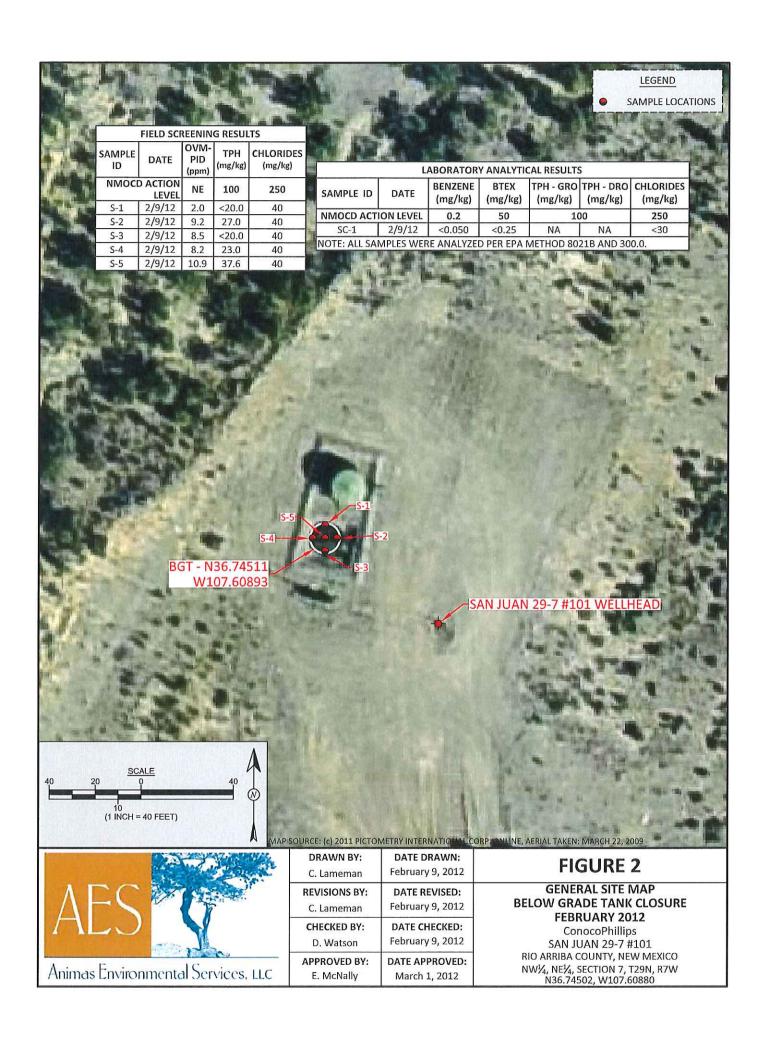
AES Field Screening Report 020912

Hall Analytical Report 1202351

Ashley Maxwell San Juan 29-7 #101 BGT Closure Report March 1, 2012 Page 5 of 5

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AES Field Screening Report

AES

Animas Environmental Services, LLC

www.animasenvironmental.com

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

> Durango, Colorado 970-403-3274

Client: ConocoPhillips

Project Location: San Juan 29-7 #101

Date: 2/9/2012

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	2/9/2012	10:45	North	2.0	40	11:22	5.81	20.0	1	DAW
S-2	2/9/2012	10:47	East	9.2	40	11:26	27.0	20.0	1	DAW
S-3	2/9/2012	10:49	South	8.5	40	11:34	19.0	20.0	1	DAW
S-4	2/9/2012	10:51	West	8.2	40	11:36	23.0	20.0	1	DAW
S-5	2/9/2012	11:50	Center	10.9	40	12:02	37.6	20.0	11	DAW

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with Silver

Dubruh Water

Nitrate

Total Petroleum Hydrocarbons - USEPA 418.1

PQL ND Practical Quantitation Limit Not Detected at the Reporting Limit

DF

Dilution Factor

*Field TPH concentrations recorded may be below PQL.

Analyst:

Page 1

Report Finalized: 2/10/12



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

OrderNo.: 1202351

February 13, 2012

Ross Kennemer Animas Environmental Services 624 East Comanche

Farmington, NM 87401 TEL: (505) 564-2281 FAX (505) 324-2022

RE: COP San Juan 29-7 #101

Dear Ross Kennemer:

Hall Environmental Analysis Laboratory received 1 sample(s) on 2/10/2012 for the analyses presented in the following report.

There were no problems with the analytical events associated with this report unless noted in the Case Narrative. Analytical results designated with a "J" qualifier are estimated and represent a detection above the Method Detection Limit (MDL) and less than the Reporting Limit (PQL). These analytes are not reviewed nor narrated as to whether they are laboratory artifacts.

Quality control data is within laboratory defined or method specified acceptance limits except if noted.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

Andy Freeman

Laboratory Manager

Only

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order 1202351

Date Reported: 2/13/2012

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services

Project: COP San Juan 29-7 #101

Lab ID: 1202351-001

Client Sample ID: SC-1

Collection Date: 2/9/2012 12:12:00 PM

Matrix: MEOH (SOIL) Received Date: 2/10/2012 10:10:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES					Analyst: RAA
Benzene	ND	0.050	mg/Kg	1	2/10/2012 1:25:46 PM
Toluene	ND	0.050	mg/Kg	1	2/10/2012 1:25:46 PM
Ethylbenzene	ND	0.050	mg/Kg	1	2/10/2012 1:25:46 PM
Xylenes, Total	ND	0.10	mg/Kg	1	2/10/2012 1:25:46 PM
Surr: 4-Bromofluorobenzene	95.5	85.3-139	%REC	1	2/10/2012 1:25:46 PM
EPA METHOD 300.0: ANIONS					Analyst: BRM
Chloride	ND	30	mg/Kg	20	2/10/2012 12:40:19 PM

Qualifiers:

X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

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

RL Reporting Detection Limit

Page 1 of 2

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1202351

13-Feb-12

Client:

Chloride

Animas Environmental Services

14

1.5

15.00

Project:

COP San Juan 29-7 #101

Sample ID MB-674	SampT	Гуре: МІ	BLK	Tes	tCode: E	PA Method	300.0: Anion	s		
Client ID: PBS	Batcl	h ID: 67	4	F	RunNo: 8	98				
Prep Date: 2/10/2012	Analysis D	Date: 2	/10/2012	S	SeqNo: 2	5516	Units: mg/k	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
SVG 75 E	12 V	- 2								

Chloride ND 1.5

Sample ID LCS-674 SampType: LCS TestCode: EPA Method 300.0: Anions Client ID: LCSS Batch ID: 674 RunNo: 898 Prep Date: 2/10/2012 Analysis Date: 2/10/2012 SeqNo: 25517 Units: mg/Kg SPK value SPK Ref Val %RPD **RPDLimit** Result PQL %REC LowLimit HighLimit Qual Analyte

0

92.3

90

110

SampType: MS Sample ID 1202320-001AMS TestCode: EPA Method 300.0: Anions Client ID: Batch ID: 674 RunNo: 898 BatchQC Prep Date: 2/10/2012 Analysis Date: 2/10/2012 SeqNo: 25529 Units: mg/Kg Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Chloride 7.5 97.8 74.6 118 15 15.00 0

Sample ID 1202320-001AMSD SampType: MSD TestCode: EPA Method 300.0: Anions Client ID: BatchQC Batch ID: 674 RunNo: 898 Analysis Date: 2/10/2012 Prep Date: 2/10/2012 SeqNo: 25530 Units: mg/Kg Analyte Result SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Chloride 15 7.5 15.00 0 97.2 74.6 118 0.546 20

Qualifiers:

*/X Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

R RPD 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 LimitRL Reporting Detection Limit

Page 2 of 2



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

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Clien	nt Name: Animas Environmental	Work Order Number: 1202351
Rece	sived by/date: AT 62/10/12	
Logge	ed By: Anne Thorne 2/10/2012 10:10:00	AM Am Ihm
Comp	pleted By: Anne Thorne 2/10/2012	ans Ilm
Revie	ewed By: A 02 10 12	
Chai	in of Custody	.E
1. V	Were seals intact?	Yes ☑ No □ Not Present □
2. I	Is Chain of Custody complete?	Yes ✓ No Not Present
3. F	How was the sample delivered?	Courier
Log i	<u>In</u>	*
4. 0	Coolers are present? (see 19. for cooler specific information)	Yes ☑ No □ NA □
5. V	Was an attempt made to cool the samples?	Yes ☑ No ☐ NA ☐
6. V	Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑ No □ NA □
7. 8	Sample(s) in proper container(s)?	Yes ☑ No □
8. 8	Sufficient sample volume for indicated test(s)?	Yes ☑ No □
9. A	Are samples (except VOA and ONG) properly preserved?	Yes ☑ No □
10. V	Was preservative added to bottles?	Yes □ No ☑ NA □
11. \	VOA vials have zero headspace?	Yes ☐ No ☐ No VOA Vials 🗹
12. V	Were any sample containers received broken?	Yes No 🗹
	Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ✓ No ☐ #of preserved bottles checked for pH:
14. A	Are matrices correctly identified on Chain of Custody?	Yes ✓ No (<2 or >12 unless noted)
15.	s it clear what analyses were requested?	Yes ✓ No ☐ Adjusted?
	Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑ No ☐ Checked by:
Spec	cial Handling (if applicable)	
17. V	Was client notified of all discrepancies with this order?	Yes No No NA 🗹
	Person Notified: Date	
	By Whom: Via:	☐ eMail ☐ Phone ☐ Fax ☐ In Person
	Regarding:	
	Client Instructions:	
18. A	Additional remarks:	
19. 9	Cooler Information Cooler No Temp °C Condition Seal Intact Seal No 1.0 Good Yes	Seal Date Signed By

88 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Project Na Project Ma Project Ma Sampler: Containe Type and (1) 4-oz glass/MEOH	AES120215 AES120215 Ross Kennemer D. Watson Type Type Type A: CMeOH 9-7 #101	× 8021 BTEX	X 300.0 Chlorides 1 490	www.ha	Www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109 Tel. 505-345-3975 Fax 505-345-4107 Analysis Request	allenvironmental.cc - Albuquerque, NI - Fax 505-345- Analysis Request	mental.com erque, NM 87- 505-345-4107 Request	87109 107		<u> </u>	
Date: Time: Retinquished by: Alia Style W. M.	Received by: (Received by:	on the chair	Date Time $79/12$ 154ω Date Time $2/10/12/610$	Rema Code Benal	Remarks: Invoic Code: T110 St Benale Area: 5		Remarks: Invoice ConocoPhillips network Code: T110 Supervisor: Sheldon Montoya Benale Area: 5	Illips neldon M	ontoya	network #:10314545 Montoya User/Appro	ž	Activit er ID:

