<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II 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.

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.

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

Santa Fe, NM 87505

Proposed Alternative Method Permit or Closure Plan Application
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. Outstand Designation Designation of the Conference LD CODID#, 14529
Operator: Burlington Resources Oil & Gas Company, LP OGRID #: 14538
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: HUERFANITO UNIT 31
API Number: 30-045-06132 OCD Permit Number:
U/L or Qtr/Qtr L Section 33 Township 27 N Range 9 W County: San Juan
Center of Proposed Design: Latitude36.52905 aN Longitude107.79874 aW NAD: ☐ 1927 ☐ 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment
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: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
☐ String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L_x W_x D
3.
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: Thicknessmil
4.
☐ <u>Alternative Method</u> :
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.	1) To a substitution
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	
П - 2-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	
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 accematerial 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.	☐ Yes ☐ No
- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells	⊠ 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	
	(<u> </u>
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).	☐ Yes ☑ No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ 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	☐ Yes ☐ No
 application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	author et 58 °°
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 NM Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doct 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 Design Plan - based upon the appropriate requirements of 19.15.17.10 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 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number: or Permit Number:	nments are NMAC 5.17.9 NMAC
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 doct 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 19.1 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC

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
Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
Proposed Closure: 19.15.17.13 NMAC	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F	luid 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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 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	☐ 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
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
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	☐ Yes ☐ No					
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division						
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 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. □ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. □ 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 cannon 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	11 NMAC 15.17.11 NMAC					
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 beli						
Name (Print): Title:	10 Constant (10 Co					
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: Approval Date:	-2016					
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: 1/26/12						
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-lo ☐ If different from approved plan, please explain.	op systems only)					
21. <u>Closure Report Attachment Checklist</u> : <u>Instructions</u> : Each of the following items must be attached to the closure report. Please in	dicate by a check					

22. 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): Kelly G. Roberts Title: Regulatory Technician
Signature: Date: 1/1/16
e-mail address: Kelly.Roberts@cop.com Telephone: (505) 326-9775

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

Lease Name: Huerfanito Unit 31

API No.: 30-045-06132

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 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)

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

Revised August 8, 2011

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

			Rele	ase Notific	atioi	n and Co	rrective A	ction		
						OPER/	ATOR		Initial Repo	ort
		ırlington R of Conoco		es, a Wholly Company		Contact Ash	ley Maxwell		*	
Address 340				IM 87402		Telephone No. 505-324-5169				
Facility Nan	ne Huerfa	nito Unit #31				Facility Typ	e Gas Well			
Surface Ow	ner Triba	—Navajo		Mineral O	wner	Federal	v	API	No. 300450	06132
				LOCA	TIOI	N OF REI	LEASE			
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/West Lir	е	County
L	33	27N	09W	1700'	S	OUTH	990'	WEST		San Juan
			L	natitude 36.52		OF RELI	EASE			
Type of Relea							Release—Unkno		e Recovered	
Source of Release—Below Grade Tank					Unknown	our of Occurrenc	e – Date a	nd Hour of E	Discovery	
Was Immediate Notice Given?					If YES, To	Whom?				
			Yes	No Not Rec	quired					
By Whom?						Date and H	20492343.00			
Was a Watercourse Reached? ☐ Yes ☐ No					If YES, Volume Impacting the Watercourse.					
If a Watercou				Taken.* Below	Grade	Tank Closu	·e Activities			,
Describe Area										
The below confirming the sample	grade tar a release was ther	nk sample re ; however, n transporte	esults we the regu d to the	ere above regu latory standard	for cl	osure at thi sults for BT	s site was dete EX and Chlori	ermined to be des were bel	1,000 pp ow the reg	m. Additionally, ulatory standards
regulations al public health should their o	l operators or the envir perations h ment. In a	are required to onment. The ave failed to a ddition, NMO	report an acceptanc dequately CD accep	is true and comple d/or file certain re e of a C-141 repor investigate and re tance of a C-141 re	lease n t by the mediate	otifications ar e NMOCD ma e contamination	nd perform correct arked as "Final Re on that pose a thre	tive actions for eport" does not eat to ground wa	eleases which elieve the op- ter, surface	ch may endanger perator of liability water, human health
Cionatura	ZC_	و ا					OIL CONS	SERVATIO	N DIVIS	ION
Signature: Printed Name					-	Approved by	Environmental S _I	pecialist:		
Title: Field I	-		t			Approval Dat	e;	Expiration	n Date:	
E-mail Addre	ss: ashley.	p.wethington	@conoco	phillips.com		Conditions of	Approval:		Attach	ed 🔲
Date: April 2	24, 2012		Phone: 5	05-324-5169						

^{*} Attach Additional Sheets If Necessary



March 26, 2012

Project Number 92115-2072

Ms. Ashley Maxwell ConocoPhillips 3401 East 30th Street Farmington, New Mexico 87401

Phone (505) 320-0699

RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE HUERFANITO #31 (HBR) WELL SITE, SAN JUAN COUNTY, NEW MEXICO

Dear Ms. Maxwell:

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the Huerfanito #31 (hBr) well site located in Section 33, Township 27 North, Range 9 West, San Juan County, New Mexico. Upon Envirotech personnel's arrival on January 26, 2012, one (1) five (5)-point composite sample was collected from directly beneath the former BGT; see enclosed *Field Notes*. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, for organic vapors using a photoionization detector (PID) and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for benzene and total BTEX using USEPA Method 8021 and for chlorides using USEPA Method 4500. The sample returned results below the regulatory limits for all constituents analyzed except TPH, which returned results above the BGT closure standard of 100 parts per million (ppm) TPH using USEPA Method 418.1, confirming a release had occurred.

A brief site assessment was conducted and the cleanup standards for the site were determined to be 1000 ppm TPH and 100 ppm organic vapors due to a horizontal distance to surface water between 200 and 1000 feet and distance to ground water greater than 100 feet from the site, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standard for TPH; see enclosed *Analytical Results*. Envirotech, Inc. recommends no further action in regards to this incident.

ConocoPhillips BGT Closure Documentation Huerfanito #31 (hBr) Project Number 92115-2072 January 2012 Page 2

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully submitted, **ENVIROTECH, INC.**

Noel Burciaga

Environmental Field Technician nburciaga@envirotech-inc.com

Enclosure(s): Field Notes

Analytical Results

Cc: Client File Number 92115

Client: Conoco Phillips (h	(Br)		(2 nvir (505) 632-0615 5 U.S. Hwy 64, Fa	(800) 362-16	379	Project N 92 VS COC No:	
FIELD REPORT: S		OSURE V						O: (OF)
QUAD/UNIT:	SEC: 33	TUM. 024	WELL#:	31			DATE FI	NISHED: 01-26-12
QTR/FOOTAGE:	BBC, JJ	1 WP: 2710	CONTRA	PM: MM	CNTYST	ST: NM	ENVIRO	NMENTAL
			CONTRA	CIOK:			SPECIAL	IST: Noer Burge
EXCAVATION APPROX:	-	FT. X		FT. X		FT. DEEF	CUBIC Y	ARDAGE:
DISPOSAL FACILITY:				REMEDIAT	ION METH			
LAND USE: 9(07)	78		LEASE:	144555		LAND OW		
	TA & A COUNTY A S			MATERIAL			دو سم	
SPILL LOCATED APPROX DEPTH TO GROUNDWATI	IMATELY:	MEADER	FT.		FROM 3	6°31.75	93, le	7 47.94441
NMOCD RANKING SCORE		NEAREST	WATER SO	URCE:		NEAREST	SURFACE	WATER:
SOIL AND EXCAVATION I		N. Nic.	NMUCD 1	PH CLOSUR	E STD:	1,000		260 - 100°
SAMPLE DESCRIPITION	TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g)	mi FREOM	DII UTION	DEADNIO	I 0410
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5 ft. comfosite	10:45	1		59	20 MI	1'-4	144	574
				J				
SPILL PER	IMETER			OVM RESULTS			SPILL P	PROFILE
* unt	N. Savar		ID (AB SAMPLE ANALYSIS	n).	A D	×	
AVEL NOTES:	CALLED OUT	:		c	ONSITE: _			

PAGE NO:\ DATE STARTED: O\ DATE FINISHED: O\		E	CONTROL OF THE PARTY OF THE PAR	(505) G32-0	rote 615 (800) 362 4, Farmington, P	2-1879	LAT: 3G	NMENTAL SPECIALIST EL BURGAGO S-52911588 NO7-7993239
	FIELD R	EPORT:	BGT / I	PIT CLO	DSURE V	ERIFIC	ATION	V
LOCATION: NAM	E: WARRAN	W Hursfanit		31	TEMP PIT:		NENT PIT:	
LEGAL ADD: UNIT:		SEC: 3		TWP: 2			ω	PM: AIM
QTR/FOOTAGE:		1 1127	CNTY:		Jan	ST: NA		224)0101
EXCAVATION APPRO		FT. X		FT. X		FT. DEEP	CUBIC Y	APDAGE:
DISPOSAL FACILITY					ATION METH		CODIC 1	ARDAGE,
LAND OWNER:		M	API: 30	045-06	\3 Z	BGT/PIT	VOLUME:	40 BBL
CONSTRUCTION MA	/1	-eel	DOUBLE	-WALLED,	WITH LEAK	DETECTIO)	N:	1.
LOCATION APPROXI			FT.		FROM WEL	LHEAD 36	31-7%	3', 107°47.9 444
DEPTH TO GROUNDY TEMPORARY PT		>100ft		(lank	ed @ 10		erm.	
BENZENE S 0.2 mg	kg RTFX < 50 m	alek 20-100 l	PEET DEEP	N1 (0016) 4 6	00 / 0			
TEMPODARY NY	ng, Dieka 50 M	grg, Gro & Dr	COFRACTIO	N (8015) S 5	00 mg/kg, TPH	$(418.1) \le 2500$	mg/kg, CHI	LORIDES ≤ 500 mg/kg
TEMPORARY PI	C - GROUNDW	ATER≥100 FE	ET DEEP	200				
NA DEDICATION OF THE PROPERTY		ykg, uku æ Dk	O FRACTIO	N (8015) ≤ 50	0 mg/kg, TPH (418.1) ≤ 2500	mg/kg, CHL	ORIDES ≤ 1000 mg/kg
PENZENE 402			1231 A O S					
' BENZENE ≤ 0.2 mg	ykg, B1EX ≤ 50 n	ng/kg, 1PH (418.	1) ≤ 100 mg/l	cg, CHLORII	$OES \le 250 \text{ mg/k}$	g		
	TDAR	ICANON DAD	T - 15 - 12	FIEI	D 418.1 ANAL	YSIS		*
	10: 43	ZOO STD		WEIGHT (g	mL FREON	DILUTION		
	10:45	SH. combosi		59	70m	1:4	197	197
			2	3				376
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			5					
			6					
PEI	RIMETER		FIELD C	HLORIDE	S RESULTS		DD.C	FILE
		,,	SAMPLE	READING	CALC.		PRC	FILE
		*	ID_		(mg/kg)			
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1.	(Legy)		SAMP	LEID	RESULTS		-	
	,	/			(mg/kg)		/ p	٧ /
					3.3			
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SAMPLE ID ANALY								
BENZE BTE		1						
GRO & I	ORO	1						ı
I CHLORI	DES	 				6 5 .		
		Ranking: WORKORDER) #		WIO CREES			
		TACKTOKTE	. #		WHO ORDERE	ט		



EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:

Sample No.:

Sample ID:

Sample Matrix: Preservative:

Condition:

ConocoPhillips

BGT Composite

Soil

Cool

Cool and Intact

Project #:

Date Reported:

Date Sampled:

Date Analyzed:

Analysis Needed:

92115-2072 2/27/2012

1/26/2012

1/26/2012 TPH-418.1

		Det.
W-00	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

576

5.0

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis

of Water and Waste, USEPA Storet No. 4551, 1978.

Comments:

Huerfanito #31 (hBr)

Instrument calibrated to 200 ppm standard and zeroed before each sample.

Analyst

Noel Burciaga

Printed

Review

Toni McKnight, EIT

Printed



CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

-	
(,0	Date:
100	 1/015

26-Jan-12

Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
ТРН	100		
	200	192	
	500		
	1000		

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Expe for	2/27/2012
Analyst	Date
Noel Burciaga	
Print Name	
Toni Mefnight	2/27/2012
Review	Date

Toni McKnight, EIT

Print Name



Field Chloride

Client:

ConocoPhillips

Sample No.: Sample ID:

BGT Composite

Sample Matrix: Preservative:

Soil

Condition:

Cool and Intact

Project #:

92115-2072

Date Reported:

Date Sampled:

2/27/2012

Date Analyzed:

1/26/2012

Analysis Needed:

1/26/2012

ded: Chloride

		Det.
_	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Field Chloride

ND

32.0

ND = Parameter not detected at the stated detection limit.

References:

"Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992

Hach Company Quantab Titrators for Chloride

Comments:

Huerfanito #31 (hBr)

Analyst

Noel Burciaga

Printed

Review

Toni McKnight, EIT

Printed



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	ConocoPhillips	Project #:	92115-2072
Sample ID:	5pt Composite	Date Reported:	01-30-12
Laboratory Number:	60959	Date Sampled:	01-26-12
Chain of Custody:	13302	Date Received:	01-26-12
Sample Matrix:	Soil	Date Analyzed:	01-30-12
Preservative:	Cool	Date Extracted:	01-27-12
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

	Dilution:	10	
Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)	
Benzene	19.3	10.0	
Toluene	ND	10.0	
Ethylbenzene	ND	10.0	
p,m-Xylene	ND	10.0	
o-Xylene	ND	10.0	
Total BTEX	19.3		

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	88.8 %
	1,4-difluorobenzene	87.3 %
	Bromochlorobenzene	92.0 %

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846,

USEPA, December 1996.

Comments:

BGT/ Line drip closures/ Huerfanito #31

Analyst

Review



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client: Sample ID: Laboratory Number: Sample Matrix: Preservative: Condition:	N/A 0130BBLK QA/QC 60959 Soll N/A N/A		Project #: Date Reported: Date Sampled: Date Received: Date Analyzed: Analysis: Dilution:		N/A 01-30-12 N/A N/A 01-30-12 BTEX		
Calibration and	I-Cal RF:	C-Cal RF:	%Diff.	Blank	Detect.		
Detection Limits (ug/L)		Accept. Ra	Accept. Range 0 - 15%		Limit		
Benzene	1.7750E+007	1.7786E+007	0.2%	ND	1.0		
Toluene	1.8069E+007	1.8105E+007	0.2%	ND	1.0		
Ethylbenzene	1.5772E+007	1.5804E+007	0.2%	ND	1.0		
p,m-Xylene	4.0805E+007	4.0886E+007	0.2%	ND	1.0		
o-Xylene	1.4660E+007	1.4689E+007	0.2%	ND	1.0		

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	19.3	19.4	0.5%	0 - 30%	10.0
Toluene	ND	ND	0.0%	0 - 30%	10.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	10.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	10.0
o-Xylene	ND	ND	0.0%	0 - 30%	10.0

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	19.3	500	503	96.8%	39 - 150
Toluene	ND	500	524	105%	46 - 148
Ethylbenzene	ND	500	509	102%	32 - 160
p,m-Xylene	ND	1000	1,040	104%	46 - 148
o-Xylene	ND	500	523	105%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996.

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using

Photolonization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: __ QA

QA/QC for Samples 60959

Analyst

Review

5796 US Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865

Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301

Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com

laboratory@envirotech-inc.con



Chloride

92115-2072

01-30-12

01-26-12

01-26-12

01-27-12

13302

Client: ConocoPhillips Project #: Sample ID: 5 pt composite Date Reported: Lab ID#: 60959 Date Sampled: Sample Matrix: Soil Date Received: Preservative: Cool Date Analyzed: Condition: Intact Chain of Custody:

Parameter

Concentration (mg/Kg)

Total Chloride

40

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments:

BGT /line drip closures/ Huerfanito #31

Analyst

Review

9

5/95 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • Three Springs • 65 Mercado Street, Suite 11	No. J.	Sample Matrix SoilVal Solid Sludge Aqueous Other Sample(s) dropped off after hours to see your drop off and the see of s	Relinquished by: (Signature)	Relinquished by: (Signature)							Set Composite		Sample No./ Identification	Client Phone No.:		CACCO Email results to:	Client
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13302

san luan reproduction 578-129

EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:

ConocoPhillips

Project #:

92115-2072

Sample No.:

BGT Composite

Date Reported:

2/27/2012

Sample ID: Sample Matrix:

Soil

Date Sampled: Date Analyzed: 1/26/2012 1/26/2012

Preservative:

Cool

Analysis Needed:

TPH-418.1

Condition:

Cool and Intact

***		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

576

5.0

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis

of Water and Waste, USEPA Storet No. 4551, 1978.

Comments:

Huerfanito #31 (hBr)

Instrument calibrated to 200 ppm standard and zeroed before each sample.

Analyst

Noel Burciaga

Printed

Toni McKnight, EIT

Printed

CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Cal. Date:

26-Jan-12

Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
TPH	100		
	200	192	
	500		
	1000		

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

	2/27/2012
Analyst	Date
Noel Burciaga	
Print Name	
Toni Methods	2/27/2012
Review	Date
Toni McKnight, EIT	
Print Name	

Field Chloride

Toni McKnight, EIT

Client: ConocoPhillips Project #: 92115-2072 Sample No.: Date Reported: 2/27/2012 Sample ID: **BGT Composite** Date Sampled: 1/26/2012 Sample Matrix: Soil Date Analyzed: 1/26/2012 Preservative: Cool Analysis Needed: Chloride Cool and Intact Condition: Det. Concentration Limit (mg/kg) (mg/kg) **Parameter** 32.0 **Field Chloride** ND ND = Parameter not detected at the stated detection limit. References: "Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992 Hach Company Quantab Titrators for Chloride Huerfanito #31 (hBr) Comments:

Analyst

Printed

Noel Burciaga



