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.

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
1 1
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.
Operator: BPX ENERGY (formerly BP AMERICA PROD. CO.) OGRID #: 778
Address: 1199 Main Ave., Suite 101, Durango, CO 81301
Facility or well name: Warren LS 008
API Number: 3004511745 OCD Permit Number: U/L or Qtr/Qtr M Section 7.0 Township 28.0N Range 8W County: San Juan County
U/L or Qtr/Qtr M Section 7.0 Township 28.0N Range 8W County: San Juan County
Center of Proposed Design: Latitude 36.670184 Longitude -107.728392 NAD: □1927 x 1983
Surface Owner: ☐ Federal ▼ State ☐ Private ☐ Tribal Trust or Indian Allotment
☐ 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 TANK ID: A
Volume: 45bbl Type of fluid: Produced Water
Tank Construction material: Steel
Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ▼ Other ☐ Double Walled Double Bottom Sidewalls not visible
Liner type: Thicknessmil
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

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other							
Monthly inspections (If netting or screening is not physically feasible)							
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC							
Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.							
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accept material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	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 ☐ 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							
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						
Vithin 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial pplication.							
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image							
Vithin 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock vatering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. Yes Yes							

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								
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								
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock vatering 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								
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								
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site								
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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.1 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API 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							

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 a	locuments 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 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						
Closure I fail - based upon the appropriate requirements of Subsection C of 19.13.17.9 (NVIAC and 19.13.17.13 (NVIAC						
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 Fl	uid Management Pit					
Proposed Closure Method: X 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 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						
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.						
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 to the the time of initial application. NM Office of the State Engineer : WATERS detabase: Visual inspection (contification) of the preposed site.						
- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site 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						
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No					

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									
Within a 100-year floodplain FEMA map									
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 cann 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	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 believed.	ef.								
Name (Print): Erin Dunman Title: Field Environmental Coordin	ator								
Signature: Cuin Dunnan Date: 08/23/2019									
e-mail address: Erin.Dunman@bpx.com Telephone: (832) 609-7048									
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)									
OCD Representative Signature: Approval Date: 8/26/19)								
Title: Environmental Specalist 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 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:									
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-logon If different from approved plan, please explain.	oop systems only)								
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in 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: 1227									

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report belief. I also certify that the closure complies with all applicable closure requirements	
Name (Print):	Title:
Signature:	Date:
e-mail address:	Telephone:

SITING AND HYDRO-GEOLOGICAL REPORT WARREN LS 008

SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be between 50 and 100 feet (ft.) below ground surface (bgs). This estimation is based on data from Stone and others (1983), and depth to groundwater data obtained from water wells permitted by the New Mexico State Engineer's Office (NMOSE). Local topography and proximity to adjacent water features are also considered.

There are no water wells permitted by NMOSE within 200 ft. from the below-grade tank (**BGT**) (Figure 1). A topographic map (Figure 2) demonstrates that the BGT is not within 100 feet of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland, or playa lake as measured from the ordinary high water mark.

The BGT subject to the attached application for a permit under 19.15.17 NMAC (New Mexico Administrative Code) was in existence prior to promulgation of 19.15.17 NMAC. A review of the best available data and a visual inspection of the siting criteria of 19.15.17 NMAC specific to the BGT in question demonstrate that the BGT does not appear to pose an imminent threat to public health and the environment.

LOCAL GEOLOGY AND HYDROLOGY

Groundwater is estimated between 50 to 100 ft. bgs. This estimation is based on Google Earth's aerial photography (Imagery date: 10/5/2016) elevation difference between the site's ground level (5,748 ft.) and the adjacent Largo Canyon Wash area (5,689 ft.).

This particular site is located on a slope close to the main channel of Largo Wash. Regional topography of Largo Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The more resistant cliff-forming sandstones of the San Jose Formation cap the interbedded siltstones, shales and sandstones of the Nacimiento Formation. Accumulations of talus and eroded sands at the base of canyon walls form steep to gentle slopes that transition into flat-bottomed arroyos within the canyons. Deposits of Quaternary alluvial and eolian sands occur prominently near the surface of Largo Canyon, especially near streams and washes.

REGIONAL GEOLOGY AND HYDROLOGY

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft /d (Stone et al, 1983). Groundwater within these aquifers flows toward the San Juan River.

REFERENCES

Circular 154—Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p



New Mexico Office of the State Engineer Wells with Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 Northing (Y): 4061754.48 Radius: 60.96 or 200 ft.



New Mexico Office of the State Engineer Wells Without Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 **Northing (Y):** 4061754.48 **Radius:** 60.96 or 200 ft.



New Mexico Office of the State Engineer Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 **Northing (Y):** 4061754.48 **Radius:** 60.96 or 200 ft.



New Mexico Office of the State Engineer Wells with Well Log Information

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned,

C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(in feet)

Sub-						v	.,	D	Log File	•	•	License
Code basir	n County	Source	6416 4	Sec	IWS KNG	X	Y	Distance Start Date	Finish Date Date	weii	water Driller	Number
SJ	SJ	Shallow	4 3	36	29N 09W	255473	4062725	1193 11/12/2015	11/12/2015 12/15/2015	35	20 BRYAN NYDOSKE	1210
SJ	SJ	Shallow	4 3	36	29N 09W	255415	4062703 🌑	1210 11/12/2015	11/12/2015 12/15/2015	40	BRYAN NYDOSKE	1210
SJ	SJ	Shallow	4 3	36	29N 09W	255445	4062735	1218 11/13/2015	11/13/2015 12/15/2015	30	17 BRYAN NYDOSKE	1210
SJ	SJ	Shallow	4 3	36	29N 09W	255399	4062714	1229 11/12/2015	11/12/2015 12/15/2015	31	18 BRYAN NYDOSKE	1210
SJ	SJ	Shallow	4 3	36	29N 09W	255393	4062734	1249 11/12/2015	11/13/2015 12/15/2015	30	13 BRYAN NYDOSKE	1210
	Sub- Code basin SJ SJ SJ	21 21 21 21 21 21 21 21 21 21	Sub- Code basin County Source SJ SJ Shallow SJ SJ Shallow SJ SJ Shallow SJ SJ Shallow	Sub-Code basin County Source 6416 4 SJ SJ Shallow 4 3	Sub- q q q q Code basin County Source 6416 4 Sec SJ SJ Shallow 4 3 36 SJ SJ Shallow 4 3 36 SJ SJ Shallow 4 3 36 SJ SJ Shallow 4 3 36	Sub- q q q Code basin County Source 6416 4 Sec Tws Rng SJ SJ Shallow 4 3 36 29N 09W SJ SJ Shallow 4 3 36 29N 09W SJ SJ Shallow 4 3 36 29N 09W SJ SJ Shallow 4 3 36 29N 09W	Sub- Code basin County q q q Code basin County Source 6416 4 Sec Tws Rng X SJ SJ Shallow 4 3 36 29N 09W 255473 SJ SJ Shallow 4 3 36 29N 09W 255415 SJ SJ Shallow 4 3 36 29N 09W 255445 SJ SJ Shallow 4 3 36 29N 09W 255399	Sub- q q q Code basin County Source 6416 4 Sec Tws Rng X Y SJ SJ Shallow 4 3 36 29N 09W 255473 4062725 SJ SJ Shallow 4 3 36 29N 09W 255415 4062703 SJ SJ Shallow 4 3 36 29N 09W 255445 4062735 SJ SJ Shallow 4 3 36 29N 09W 255399 4062714	Sub-Code basin County q q q Code basin County Source 6416 4 Sec Tws Rng X Y Distance Start Date SJ SJ Shallow 4 3 36 29N 09W 255473 4062725 1193 11/12/2015 SJ SJ Shallow 4 3 36 29N 09W 255415 4062703 1210 11/12/2015 SJ SJ Shallow 4 3 36 29N 09W 255445 4062735 1218 11/13/2015 SJ SJ Shallow 4 3 36 29N 09W 255399 4062714 1229 11/12/2015	Sub- Code basin County q q q q Tws Rng X Y Distance Date Start Date Finish Date Date SJ SJ Shallow 4 3 36 29N 09W 255473 4062725 1193 11/12/2015 11/12/2015 11/12/2015 12/15/2015 SJ SJ Shallow 4 3 36 29N 09W 255415 4062703 1210 11/12/2015 11/12/2015 11/12/2015 12/15/2015 SJ SJ Shallow 4 3 36 29N 09W 255445 4062735 1218 11/13/2015 11/13/2015 11/13/2015 12/15/2015 SJ SJ Shallow 4 3 36 29N 09W 255399 4062714 1229 11/12/2015 11/12/2015 11/12/2015 12/15/2015	Sub- Code basin County q q q q Ker Tws Rng X Y Distance Start Date Finish Date Depth SJ SJ Shallow 4 3 36 29N 09W 255473 4062725 1193 11/12/2015 11/12/2015 12/15/2015 35 SJ SJ Shallow 4 3 36 29N 09W 255415 4062703 1210 11/12/2015 11/12/2015 12/15/2015 40 SJ SJ Shallow 4 3 36 29N 09W 255445 4062735 1218 11/13/2015 11/13/2015 12/15/2015 30 SJ SJ Shallow 4 3 36 29N 09W 255399 4062714 1229 11/12/2015 11/12/2015 12/15/2015 31	Sub- Code basin County q q q q Tws Rng X Y Distance Date Start Date Finish Date Date Depth Well Water Driller SJ SJ Shallow 4 3 36 29N 09W 255473 4062725 0 1193 11/12/2015 11/12/2015 12/15/2015 35 20 BRYAN NYDOSKE SJ SJ Shallow 4 3 36 29N 09W 255415 4062703 0 1218 11/12/2015 11/13/2015 12/15/2015 40 BRYAN NYDOSKE SJ SJ Shallow 4 3 36 29N 09W 255445 4062735 0 1218 11/13/2015 11/13/2015 12/15/2015 30 17 BRYAN NYDOSKE SJ SJ Shallow 4 3 36 29N 09W 255399 4062714 0 1229 11/12/2015 11/12/2015 12/15/2015 31 18 BRYAN NYDOSKE

Record Count: 5

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 Northing (Y): 4061754.48 Radius: 1609.3 or 1 mile.



New Mexico Office of the State Engineer

Point of Diversion Summary

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

Well Tag POD Number

Q64 Q16 Q4 Sec Tws Rng

X Y

SJ 04069 POD15

4 3 36 29N 09W

255473 4062725

ď

Driller License: 1210 Driller Company: CASCADE DRILLING, LP

Driller Name: BRYAN NYDOSKE

Drill Start Date: 11/12/2015

Drill Finish Date:

11/12/2015

Plug Date:

Log File Date:

12/15/2015

PCW Rcv Date:

Source:

Shallow

Pump Type:

Pipe Discharge Size:

Estimated Yield:

Casing Size:

2.00

Depth Well:

35 feet

Depth Water:

20 feet

Water Bearing Stratifications:

Top Bottom Description

12

35 Sandstone/Gravel/Conglomerate

Casing Perforations:

Top Bottom

13 33

SJ04069 POD15 located 36.678745,-107.736467 or 0.74 miles, N37W from bgt.

SJ04069 POD15 ground level elevation - 5,684 ft. Largo Canyon Wash elevation - 5,673 ft. Groundwater elevation - 5,664 ft.

(Google Earth aerial photography; Imagery date: 10/5/2016).

8/22/19 1:59 PM Page 1 of 1 POD SUMMARY - SJ 04069 POD15



New Mexico Office of the State Engineer Wells Without Well Log Information

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.) (R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (N.

(NAD83 UTM in meters)

		POD			q	q	q						
POD Number	Code	Subbasin	County	Source	64	16	4	Sec	Tws	Rng	X	Υ	Distance
SJ 04069 POD6		SJ	SJ		1	4	3	36	29N	09W	255454	4062703 🎒	1187
SJ 04069 POD2		SJ	SJ		1	4	3	36	29N	09W	255453	4062710 🎒	1193
SJ 04069 POD7		SJ	SJ		1	4	3	36	29N	09W	255457	4062722 🌍	1200
SJ 04069 POD1		SJ	SJ		1	4	3	36	29N	09W	255451	4062721 🎒	1203
SJ 04069 POD8		SJ	SJ		1	4	3	36	29N	09W	255435	4062711 🎒	1204
SJ 04069 POD9		SJ	SJ		1	4	3	36	29N	09W	255435	4062723 🎒	1214
SJ 04069 POD10		SJ	SJ		1	4	3	36	29N	09W	255419	4062712 🎒	1215
SJ 04069 POD5		SJ	SJ	Shallow	1	4	3	36	29N	09W	255447	4062735 🎒	1217
SJ 04069 POD3		SJ	SJ		1	4	3	36	29N	09W	255421	4062724 🎒	1224
SJ 04069 POD11		SJ	SJ		1	4	3	36	29N	09W	255408	4062726 🎒	1233
SJ 04069 POD4		SJ	SJ		1	4	3	36	29N	09W	255420	4062736 🎒	1234

Record Count: 11

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 Northing (Y): 4061754.48 Radius: 1609.3 or 1 mile.



New Mexico Office of the State Engineer Point of Diversion with Meter Attached

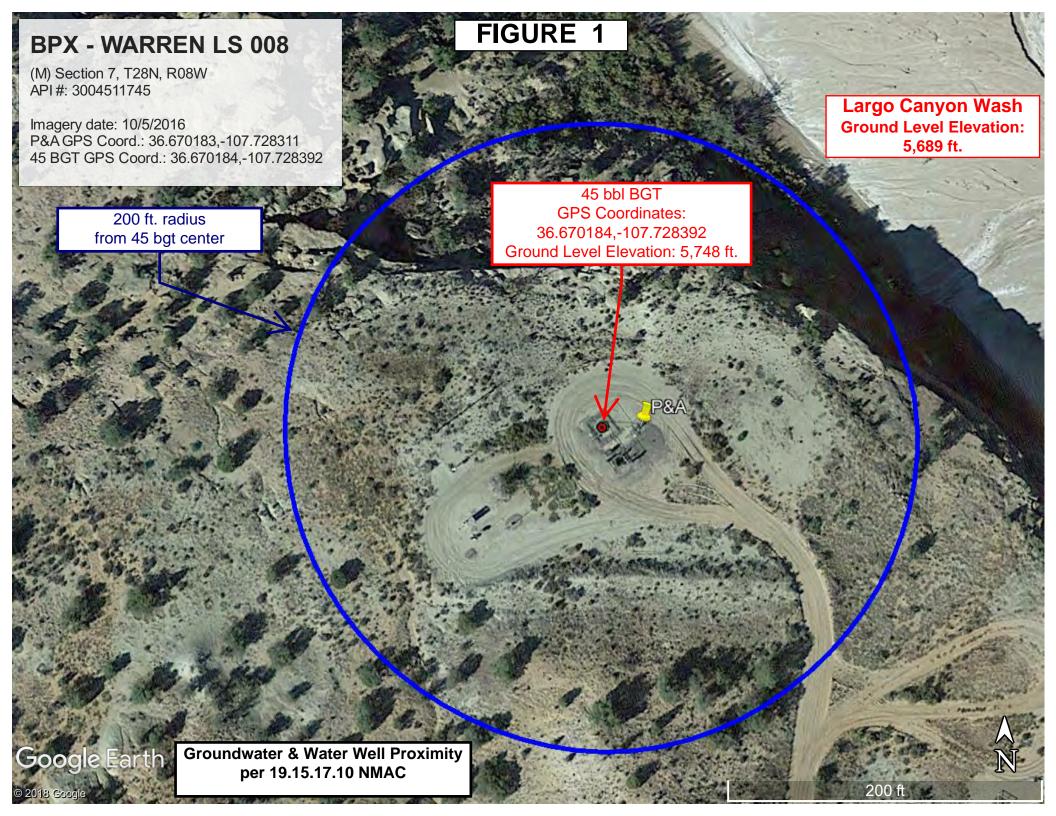
No PODs found.

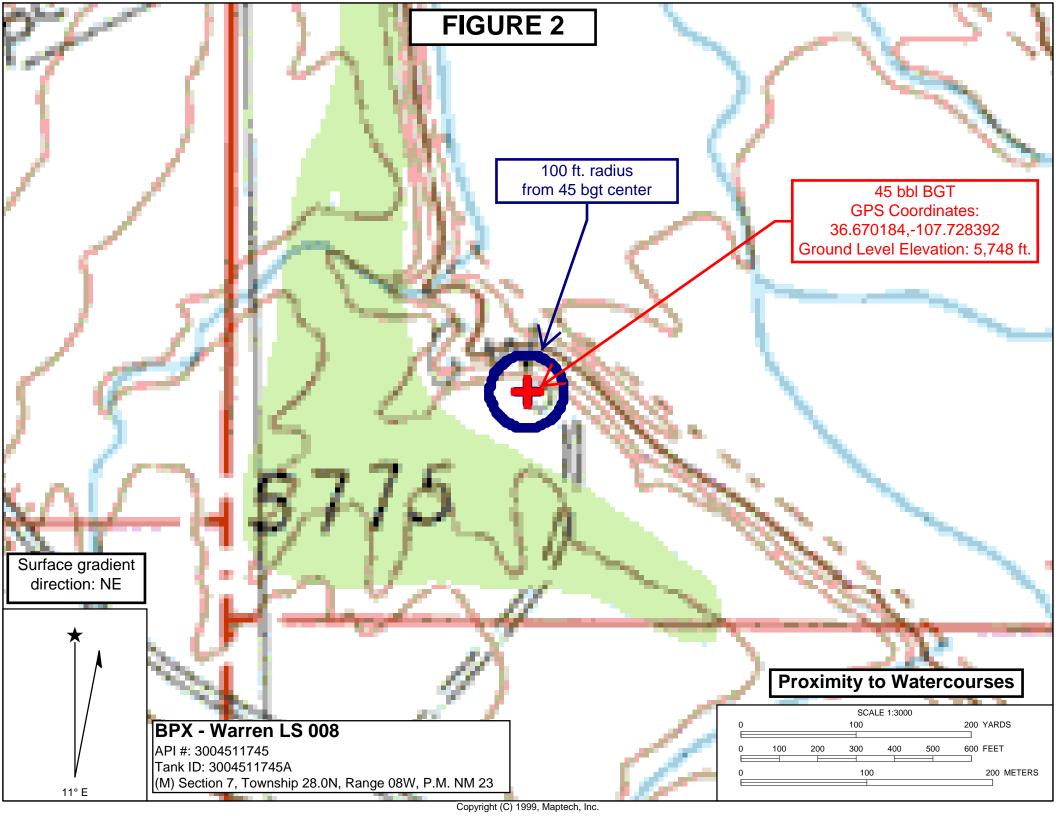
Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 256167.27 Northing (Y): 4061754.48 Radius: 1609.3 or 1 mile.





BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, BP will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, BP will request preapproval from the Division District III office of any specific changes and will be included on form C-144. BP shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

General Closure Plan

- 1. BP shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
- 2. BP shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
- 3. Within 60 days of cessation of operations, BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
- 4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
- 5. Within six months of cessation of operations, BP shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
- 6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table 1 on following page).

Table 1 Closure Criteria for Soils Beneath Below-Grade Tanks								
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**					
	Chloride	EPA 300.0	600 mg/kg					
≤50 feet	ТРН	EPA SW-846 Method 418.1	100 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					
	Chloride	(EPA 300.0)	(10,000 mg/kg)					
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg					
51 feet-100 feet	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	(50 mg/kg)					
	Benzene Chloride	EPA SW-846 Method 8021B or 8015M EPA 300.0	10 mg/kg 20,000 mg/kg					
	ТРН	EPA SW-846 Method 418.1	2,500 mg/kg					
> 100 feet	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					

Notes:

mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.

- * Or other test methods approved by the division
- ** Numerical limits or natural background level, whichever is greater
- 7. If any contaminant concentration exceeds those standards set in Table I, BP will acknowledge NMOCD's position to require additional delineation upon review of the results. BP will not proceed with any further closure activities until approval is first granted by NMOCD.
- 8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then BP shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
- 9. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) of Subsection H of 19.15.17.13 NMAC.
- 10. BP may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOCD's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. BP will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOCD for its approval.
- 11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.

- 12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.
- 13. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
- 14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
- 15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
- 16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and 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.
- 17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of BP subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
- 18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, BP shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
- 19. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. necessary attachments to document all closure activities
 - b. sampling results
 - c. information required by 19.15.17 NMAC
 - d. details on back-filling, capping and covering, where applicable.
- 20. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

SOUTHERN SAN JUAN BASIN (SSJB) Figure Citation List August 2019

Figure 1: Groundwater Greater Than 50 ft., Less Than 100 ft.

Layers: Aerial Imagery: Google Earth Pro (10/5/2016)

Evaluation completed by Blagg Engineering, Inc., Bloomfield, NM. (2019)

Figure 2: Proximity to Significant Watercourses

Layers: Topographic Imagery: USGS (1999)

USGS 24k Topographic map series. 1:24000. Maps are seamless, scanned images of USGS paper topographic maps. Data created using Terrain Navigator, Copyright 1999, Maptech Inc.