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

Alternate. Please specify

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.

BGT B P. 1 A14 C. M. (1 1 1 P. 1 1 C. 1 P. 1 A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1							
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 of this request does not refleve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.							
Operator: SIMCOE LLC operated by BP America Production Co. OGRID #: 329736							
Address: 1199 Main Ave., Suite 101, Durango, CO 81301							
Facility or well name: NORTHEAST BLANCO UNIT 017A							
API Number: 3003921695 OCD Permit Number: Pie Arriba Country							
U/L or Qtr/Qtr F Section 9.0 Township 30.0N Range 07W County: Rio Arriba County							
Center of Proposed Design: Latitude         36.830650         Longitude         -107.580558         NAD: ☐ 1927 ▼ 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.    Relow grade tanks   Subsection Lef 10.15.17.11 NIMAC   TANK ID:   B							
Delow-grade tank. Subsection 1 of 19.13.17.11 NNIAC							
Volume:bbl 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							
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							
1 our root neight, rour straints of barbed whe eventy spaced between one and rour rect							

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	
Nation State Stat	
9. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC <i>Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below.</i> Siting criteria does not apply to drying pads or above-grade tanks.	ptable 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. ( <b>Does not apply to below grade tanks</b> )  - 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
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes 🗷 No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes 🗷 No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site: Aerial photo: Satellite image	☐ Yes ☐ No
· · · · · · · · · · · · · · · · · · ·	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
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 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 19.15.17.13 NMAC   Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC   Previously Approved Design (attach copy of design)   API Number: or Permit Number: or Permit Number:	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  Previously Approved Design (attach copy of design) API Number: or Permit 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	documents are
attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment  Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> 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	aveaments are
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	1 '114 (P'
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F.  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	luid Management Pit
Alternative Closure Method  14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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. F 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 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 Di	vision	☐ Yes ☐ No				
Within an unstable area.  - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Res	ources; USGS; NM Geological					
Society; Topographic map Within a 100-year floodplain.		☐ Yes ☐ No				
- FEMA 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 Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  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						
Operator Application Certification:  I hereby certify that the information submitted with this application is true, accurate and complete		ief.				
Name (Print): Steve Moskal Steven Moskal Title:	Environmental Coordinator	<del></del>				
Signature: 2020.08.06 10:23:07	08/06/2020					
e-mail address: steven.moskal@bpx.com  Telephone:	(505) 330-9179					
18. OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ O	CD Conditions (see attachment)					
OCD Representative Signature:	Approval Date: 9/15/2	020				
Title: Environmental Specialist OCD Permit N	umber: BGT B					
19.  Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC  Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report.  The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.  Closure Completion Date:						
Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternative Closure Methol If different from approved plan, please explain.	nod   Waste Removal (Closed-lo	oop systems only)				
21.  Closure Report Attachment Checklist: Instructions: Each of the following items must be attack 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	hed to the closure report. Please in NAD: □1927					

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

### SITING AND HYDRO-GEOLOGICAL REPORT FOR NORTHEAST BLANCO UNIT 017A

### SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is well in excess of 100 feet (ft.). Local topography and proximity to adjacent water features were also considered. Based on a search of the New Mexico State Engineer's Office (attached), there are no freshwater wells or springs used for public or livestock consumption within 200 horizontal ft. (Figure 1) of the below-grade tank (BGT). The nearest water well listed in Figure 1A is POD # SJ03640 (attached). This well is located 1.52 miles, S31E from the BGT, with a ground level elevation of 6,278 ft., and had recorded depth to water at 241 ft. resulting in a groundwater elevation of 6,037 ft. A topographic map (Figure 2) demonstrates that the BGT is not within 100 ft. of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake as measured from the ordinary high water mark.

### LOCAL GEOLOGY AND HYDROLOGY

The well site is located on a mesa top approximately 1,003 ft. south of Navajo Reservoir. The mesa is composed of the Nacimiento Formation. Broad shaley hills are interspersed with sandstone outcrops and systems of canyons and surface drainages leading into the reservoir. The BGT ground level elevation (6,334 ft.) is greater than 245 ft. when the reservoir is at its maximum capacity (estimated at 6,085 ft.).

### 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 2,232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1,000 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

	:	License	Number	1508	1223	717	1374	1508	1357
		epth	Water Driller	241 HARGIS, WILLIAM CALVIN	225 RILEY, JAY	285 HOOD, TERRY (LD)	255 GLOVER, PAUL A.	460	380 BAILEY, MARK
(in feet)	;		Well	433	345	455	402	520	460
		-ile	Finish Date Date	04/12/2006 06/02/2005	2458 03/20/1992 06/03/1992 06/15/1992	03/30/2011 04/03/2011 04/06/2011	2588 05/02/1996 05/18/1996 05/31/1996	2749 02/15/2004 02/18/2004 02/25/2004	2827 06/27/2017 07/03/2017 07/14/2017
lers)			Distance Start Date	2452 03/25/2006	2458 03/20/1992	2532 03/30/2011	2588 05/02/1996	2749 02/15/2004	2827 06/27/2017
(NAD83 UTM in meters)			>	4077061* 🌑	4077047	4076902	4076962*	4076513*	4082017 🌑
			×	271072	271062	270941	271173	269251	270010
(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest)			Sec Tws Rng	15 30N 07W	15 30N 07W	5 30N 07W	5 30N 07W	7 30N 07W	33 31N 07W
(quarters ar		<b>В</b> В	Source 6416 4	Shallow 1 1 3 15 30N 07W	Shallow 1 3	Shallow 4 2 4 15 30N 07W	Shallow 1 3 15 30N 07W	Shallow 4 4 4 17 30N 07W	Shallow 1 2 3 33
(quarte		<b>В</b> В В	County Source 6416 4	Ą	RA Shallow 1 3 15 30N 07W	RA Shallow 4 2 4 1	RA Shallow 131	RA Shallow 4 4 4 1	
(R=POD has been replaced, O=orphaned, C=the file is (quarters ar closed) (quarters ar (quarters)		Sub-dus	Code basin County Source 6416 4 Sec Tws Rng	SJ RA Shallow 1 1 3	SJ RA Shallow 13				SJAR SJ Shallow 1 2 3

Record Count: 6

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 269861.8

Northing (Y): 4079194

Radius: 3218.6 = 2 miles

'UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, us suitability for any particular purpose of the data.

8/5/20 7:53 AM



## 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)

POD Number

Well Tag

SJ 03640

**Driller License: 1508** 

(NAD83 UTM in meters)

Q64 Q16 Q4 Sec Tws Rng

15 30N 07W

271072 4077061\*

HARGIS CONSULTING WATER WELL **Driller Company:** 

HARGIS, WILLIAM CALVIN Driller Name:

04/12/2006 **Drill Finish Date: Drill Start Date:** 03/25/2006

PCW Rcv Date: 06/02/2005 Log File Date: Pipe Discharge Size:

Depth Well:

4.50

Casing Size: Pump Type:

Estimated Yield: 12 GPM **433** feet

241 feet Depth Water:

Shallow

Plug Date: Source:

Shale/Mudstone/Siltstone Top Bottom Description

Shale/Mudstone/Siltstone

242 353

240

Water Bearing Stratifications:

433 320

**Top Bottom** Casing Perforations:

## \*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, or suitability for any particular purpose of the data.

8/5/20 8:51 AM

POINT OF DIVERSION SUMMARY

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

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 269861.8

**Radius:** 60.96

Northing (Y): 4079194

= 200 ft.

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

| Page 1 of 1 | WELLS WITH WELL LOG INFORMATION |



### 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): 269861.8 Northing (Y): 4079194 Radius: 60.96 = 200 ft.

POINT OF DIVERSION WITH METER ATTACHED

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

No PODs found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 269861.8

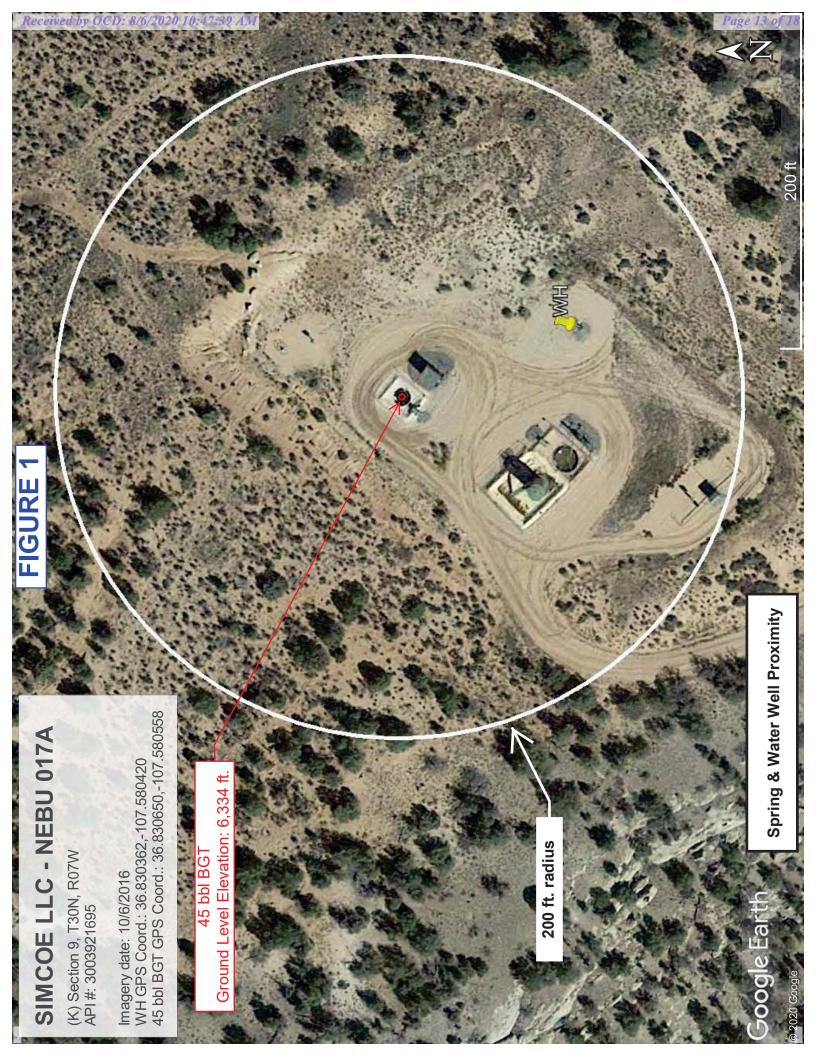
Northing (Y): 4079194

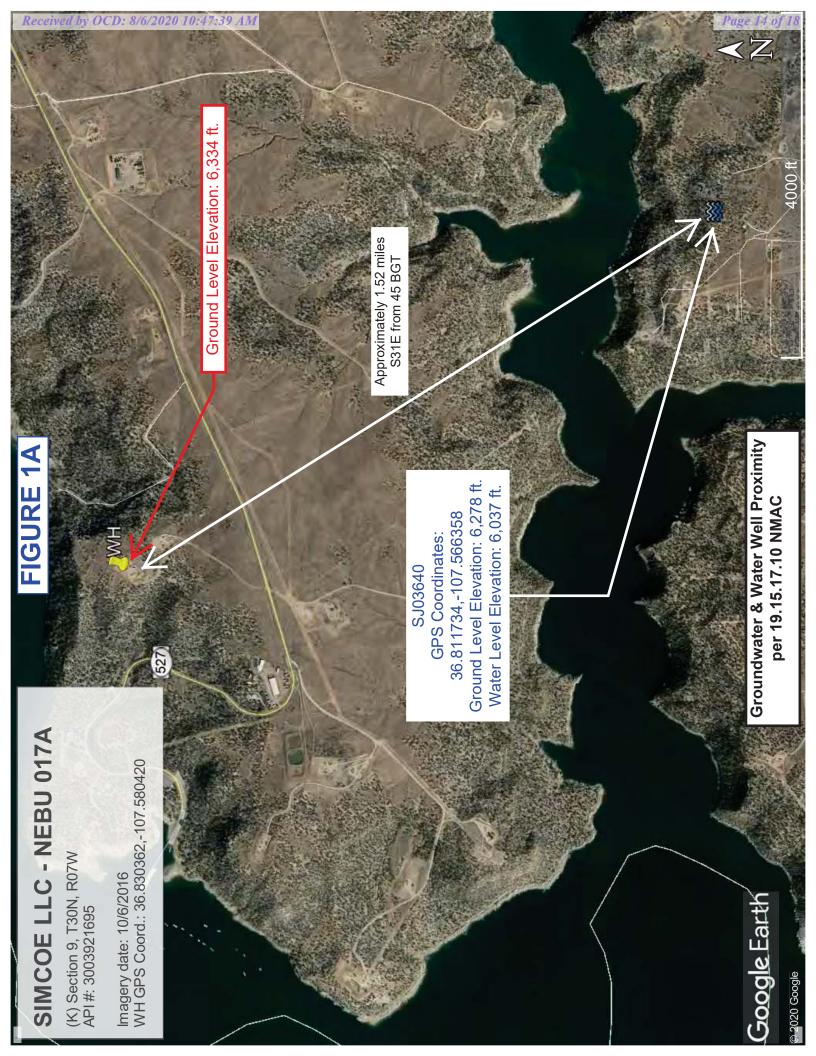
= 200 ft.**Radius:** 60.96

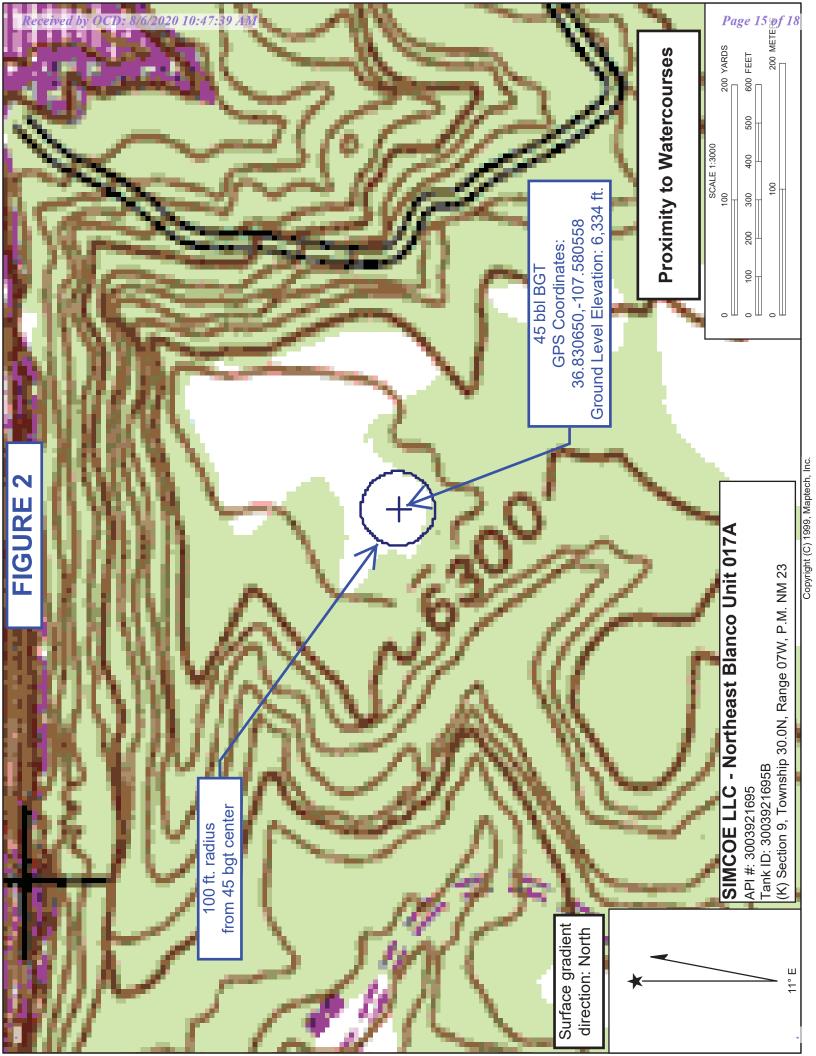
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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### SIMCOE LLC (formerly BPX Energy Inc.) 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 SIMCOE LLC (SIMCOE) 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, SIMCOE 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, SIMCOE will request preapproval from the Division District III office of any specific changes and will be included on form C-144. SIMCOE 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. SIMCOE 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. SIMCOE 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, SIMCOE 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. SIMCOE LLC 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. SIMCOE LLC Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
  - f. SIMCOE LLC Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
  - g. SIMCOE LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
  - h. SIMCOE LLC Operated GCU 306 SWD, API 30-045-24286 (Liquids)
  - i. SIMCOE LLC Operated GCU 307 SWD, API 30-045-24248 (Liquids)
  - j. SIMCOE LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
  - k. SIMCOE LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
- 4. SIMCOE 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, SIMCOE shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
- 6. SIMCOE shall test the soils beneath the BGT to determine whether a release has occurred. SIMCOE 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 EPA 300.0	10 mg/kg 10,000 mg/kg			
51 feet-100 feet						
	ТРН	EPA SW-846 Method 418.1	2,500 mg/kg			
	GRO+DRO	EPA SW-846 Method 8015M EPA SW-846 Method	1,000 mg/kg			
	Benzene	8021B or 8260B EPA SW-846 Method	50 mg/kg 10 mg/kg			
	Chloride	8021B or 8015M EPA 300.0	20,000 mg/kg			
	(TPH)	EPA SW-846 Method 418.1	2,500 mg/kg			
> 100 feet	GRO+DRO BTEX	(EPA SW-846) (Method 8015M) (EPA SW-846 Method)	(1,000 mg/kg) (50 mg/kg)			
	Benzene	8021B or 8260B EPA SW-846 Method	(30 mg/kg)			
	Benzelle	8021B or 8015M	TO HIG/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, SIMCOE will acknowledge NMOCD's position to require additional delineation upon review of the results. SIMCOE 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 SIMCOE shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
- 9. SIMCOE 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. SIMCOE 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. SIMCOE 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. SIMCOE 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 SIMCOE 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, SIMCOE shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
- 19. Within 60 days of closure completion, SIMCOE 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. SIMCOE 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.