

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

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

Form C-144  
June 24, 2008

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

268  
Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

RCVD JUL 22 '08  
OIL CONS. DIV.

Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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: BP AMERICA PRODUCTION COMPANY OGRID #: 778  
Address: 200 ENERGY COURT, FARMINGTON, NM 87410 OIL CONS. DIV DIST. 3  
Facility or well name: A L ELLIOTT B 003 MAY 20 2014  
API Number: 3004508609 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr D Section 10 Township 29.0N Range 09W County: San Juan  
Center of Proposed Design: Latitude 36.74466 Longitude -107.77324 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

<input type="checkbox"/> <b>Pit:</b> Subsection F or G of 19.15.17.11 NMAC Temporary: <input type="checkbox"/> Drilling <input type="checkbox"/> Workover <input type="checkbox"/> Permanent <input type="checkbox"/> Emergency <input type="checkbox"/> Cavitation <input type="checkbox"/> Steel Pit <input type="checkbox"/> Lined <input type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____ <input type="checkbox"/> String-Reinforced Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____	<input type="checkbox"/> <b>Closed-loop System:</b> Subsection H of 19.15.17.11 NMAC <input type="checkbox"/> Drying Pad <input type="checkbox"/> Tanks <input type="checkbox"/> Haul-off Bins <input type="checkbox"/> Other _____ <input type="checkbox"/> Lined <input type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____ Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: _____ bbl _____ yd <sup>3</sup> Dimensions: Length _____ x Width _____
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<input checked="" type="checkbox"/> <b>Below-grade tank:</b> Subsection I of 19.15.17.11 NMAC Volume: <u>21</u> bbl Type of fluid: <u>produced water</u> Tank Construction material: <u>steel</u> <input type="checkbox"/> Secondary containment with leak detection <input type="checkbox"/> Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off <input type="checkbox"/> Visible sidewalls and liner <input checked="" type="checkbox"/> Visible sidewalls only <input type="checkbox"/> Other _____ Liner type: Thickness _____ mil <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____	<b>Fencing:</b> Subsection D of 19.15.17.11 NMAC <input type="checkbox"/> Chain link, six feet in height, two strands of barbed wire at top <input type="checkbox"/> Four foot height, four strands of barbed wire evenly spaced between one and four feet <b>Netting:</b> Subsection E of 19.15.17.11 NMAC <input type="checkbox"/> Screen <input type="checkbox"/> Netting <input type="checkbox"/> Other _____ <input type="checkbox"/> Monthly inspections <b>Signs:</b> Subsection C of 19.15.17.11 NMAC <input type="checkbox"/> 12'x24', 2' lettering, providing Operator's name, site location, and emergency telephone numbers <input checked="" type="checkbox"/> Signed in compliance with 19.15.3.103 NMAC
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<input type="checkbox"/> <b>Alternative Method:</b> Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	<b>Administrative Approvals and Exceptions:</b> Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. <b>Please check a box if one or more of the following is requested, if not leave blank:</b> <input type="checkbox"/> Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval. <input type="checkbox"/> Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
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**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

**Instructions:** The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

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| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| 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).<br>- Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>(Applies to temporary, emergency, or cavitation pits and below-grade tanks)<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>(Applies to permanent pits)<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input checked="" type="checkbox"/> NA |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |
| Within a 100-year floodplain.<br>- FEMA map  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No                                |

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

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

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
  - Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
  - Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
  - Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
  - Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
  - Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

**Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

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

- Geologic and Hydrogeologic Data (required for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9 NMAC
  - Siting Criteria Compliance Demonstrations (required for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
  - Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
  - Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
  - Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_

**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

**Proposed Closure:** 19.15.17.13 NMAC

- Type:  Drilling  Workover  Emergency  Cavitation  Permanent Pit  Below-grade Tank  Closed-loop System  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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

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

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

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|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| 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).<br>- Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within a 100-year floodplain.<br>- FEMA map   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

**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 F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

**Waste Removal Closure For Closed-loop Systems That Utilize Haul-off Bins Only:** (19.15.17.13.D NMAC) *Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

**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 F of 19.15.17.13 NMAC
- Construction and Design of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 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 belief.

Name (Print): LARRY SCHLOTTERBACK Title: ENVIRONMENTAL COORDINATOR  
Signature: *Larry Schlotterback* Date: JULY 21, 2008  
e-mail address: SchlLn@bp.com Telephone: (505) 326-9200

**OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)

OCD Representative Signature: *Bob Bell* Approval Date: 6/5/2008  
Title: Enviro Spec *Jonathan D. Kelly* 8-4-08  
OCD Permit Number: Compliance Officer

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

Closure Completion Date: 10-30-2008

**Closure Method:**

- Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method
- If different from approved plan, please explain.

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

- Proof of Closure Notice
- Proof of Deed Notice (if applicable)
- Plot Plan
- Confirmation Sampling Analytical Results
- Waste Material Sampling Analytical Results
- 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 36.74466 Longitude -107.77324 NAD:  1927  1983

**Operator Closure Certification:**

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

Name (Print): Jeff Peace Title: Area Environmental Advisor  
Signature: *Jeff Peace* Date: May 19, 2014  
e-mail address: peace.jeffrey@bp.com Telephone: (505) 326-9479

BP AMERICA PRODUCTION COMPANY  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

A. L. Elliott B 3

API No. 3004508609

Unit Letter D, Section 10, T29N, R9W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.  
**No notice was made due to misunderstanding of the notice requirements. Closure notices will be made for all BGT closures from this point forward.**
2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location 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.  
**No notice was made due to misunderstanding of the notice requirements. Closure notices will be made for all BGT closures from this point forward.**
3. 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's division-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)

**All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.**

- 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 NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

**The BGT was transported to a storage area for sale and re-use.**

- 5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

**All equipment associated with the BGT has been removed.**

- 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 and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method <b>21 bbl BGT</b>	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.007
TPH	US EPA Method SW-846 418.1	100	95
Chlorides	US EPA Method 300.0 or 4500B	250 or background	30

**Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.**

**Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.**

7. BP shall notify the division District III office of its results on form C-141.  
**C-141 is attached.**
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.  
**Sampling results indicate no release occurred.**
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not within the active process area  
**The area under the BGT was backfilled with clean soil and is still within the active well area.**
10. 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 Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.  
**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**
11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. 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.  
**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**
12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.  
**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**
13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.  
**BP will seed the area when the well is plugged and abandoned.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.

**BP will notify NMOCD when re-vegetation is successful.**

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following:
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.

**Closure report on C-144 form is included.**

16. 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.

**Certification section of C-144 has been completed.**

District I  
1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised August 8, 2011

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

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

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: A. L. Elliott B 3	Facility Type: Natural gas well
Surface Owner: Federal	Mineral Owner: Federal
API No. 3004508609	

**LOCATION OF RELEASE**

Unit Letter D	Section 10	Township 29N	Range 9W	Feet from the 660	North/South Line North	Feet from the 590	East/West Line West	County: San Juan
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Latitude 36.74466 Longitude 107.77324

**NATURE OF RELEASE**

Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tank – 21 bbl	Date and Hour of Occurrence:	Date and Hour of Discovery:
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chloride below standards. Analysis results are attached.		
Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. The excavated area was backfilled and compacted and is still within the active well area.		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Jeff Peace	Approved by Environmental Specialist:	
Title: Area Environmental Advisor	Approval Date:	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: May 19, 2014	Phone: 505-326-9479	

\* Attach Additional Sheets If Necessary

CLIENT: <b>BP</b>	<b>BLAGG ENGINEERING, INC.</b> P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	LOCATION NO: -
		COCR NO: <b>5618</b>

## FIELD REPORT: PIT CLOSURE VERIFICATION

PAGE No: **1** of **1**

DATE STARTED: **10/23/08**

DATE FINISHED: \_\_\_\_\_

ENVIRONMENTAL SPECIALIST: **JCB**

LOCATION: NAME: **A.L. ELLIOTT B** WELL #: **3** TYPE: **21 BGT**

QUAD/UNIT: **D** SEC: **10** TWP: **29N** RNG: **9W** PM: **NM** CNTY: **SJ** ST: **NM**

QTR/FOOTAGE: **NW/NW** CONTRACTOR: **-**

EXCAVATION APPROX. **NA** FT. x **NA** FT. x **NA** FT. DEEP. CUBIC YARDAGE: **0**

DISPOSAL FACILITY: **NA** REMEDIATION METHOD: **CLOSE AS IS**

LAND USE: **BLM - RANGE** LEASE: **SF 078132** FORMATION: **PC**

FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY **78** FT. **S40W** FROM WELLHEAD.

DEPTH TO GROUNDWATER: **>100'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **>1,000'**

NMOCD RANKING SCORE: **0** NMOCD TPH CLOSURE STD: **5,000** PPM

OVM CALIB. READ. =	<b>52.7</b>	ppm
OVM CALIB. GAS =	<b>100</b>	ppm RF = 0.52
TIME: <b>1:50</b>	am/pm	DATE: <b>10/23/08</b>

SOIL AND EXCAVATION DESCRIPTION:

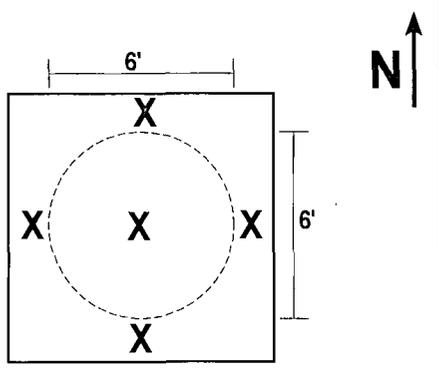
SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER  
 SOIL COLOR: \_\_\_\_\_  
 COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE  
 CONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSE  
 PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC  
 DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD  
 MOISTURE: DRY / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED  
 DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION - \_\_\_\_\_  
 HC ODOR DETECTED: YES / NO EXPLANATION - \_\_\_\_\_  
 SAMPLE TYPE: GRAB COMPOSITE # OF PTS. **5**  
 ADDITIONAL COMMENTS: **21 BBL SW/DB (5' X 6' HIGH) IN 6' X 6' X 5' DEEP DEPRESSION COLLECT 5-pt. COMPOSITE @ TB AFTER PULLED TANK.**

<b>WELLHEAD</b>
<b>36.74479</b>
<b>107.77311</b>
<b>PIT CENTER</b>
<b>36.74466</b>
<b>107.77324</b>

FIELD 418.1 CALCULATIONS

SCALE	SAMP. TIME	SAMP. ID	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. (ppm)
0  FT								

PIT PERIMETER



X = COMPOSITE SAMPLE POINT

PIT PROFILE

OVM READING

SAMPLE ID	FIELD HEADSPACE (ppm)
1 @	
2 @	
3 @	
4 @	
5 @	
5-pt. @ 5'	0.0
@ TB	

NA

LAB SAMPLES

SAMPLE ID	ANALYSIS	TIME
5-pt.	TPH	1345
	BTEX	
	CI-	

P.D. = PIT DEPRESSION; B.G. = BELOW GRADE; B = BELOW  
 T.H. = TEST HOLE; ~ = APPROX.; T.B. = TANK BOTTOM

TRAVEL NOTES: \_\_\_\_\_ CALLOUT: \_\_\_\_\_ ONSITE: **10/23/08 1:30 PM**

# ENVIROTECH LABS

PRactical SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	5 pt @ 5' @ TB	Date Reported:	10-30-08
Laboratory Number:	47873	Date Sampled:	10-23-08
Chain of Custody No:	5618	Date Received:	10-24-08
Sample Matrix:	Soil	Date Extracted:	10-27-08
Preservative:	Cool	Date Analyzed:	10-27-08
Condition:	Intact	Analysis Needed:	TPH-418:1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons:	95.0	5.0

ND = Parameter not detected at the stated detection limit.

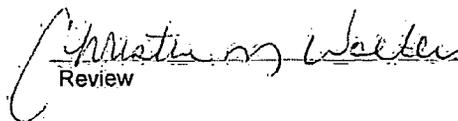
References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA. Stotet No. 4551, 1978.

Comments: A.L. Elliott B #3.

Analyst



Review





EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	5 pt @ 5' @ TB	Date Reported:	10-29-08
Laboratory Number:	47873	Date Sampled:	10-23-08
Chain of Custody:	5618	Date Received:	10-24-08
Sample Matrix:	Soil	Date Analyzed:	10-28-08
Preservative:	Cool	Date Extracted:	10-27-08
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Def. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	2.4	1.0
Ethylbenzene	1.2	1.0
p,m-Xylene	2.0	1.2
o-Xylene	1.3	0.9
<b>Total BTEX</b>	<b>6.9</b>	

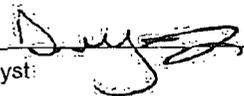
ND - Parameter not detected at the stated detection limit.

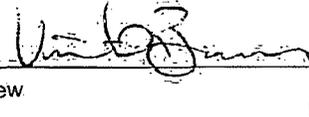
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	97.0 %
	1,4-difluorobenzene	97.0 %
	Bromochlorobenzene	97.0 %

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: A.L. Elliot B #3

Analyst: 

Review: 

# ENVIROTECH LABS

PRactical SOLUTIONS FOR A BETTER TOMORROW

Chloride

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	5 pt @ 5' @ TB	Date Reported:	10-30-08
Lab ID#:	47873	Date Sampled:	10-23-08
Sample Matrix:	Soil	Date Received:	10-24-08
Preservative:	Cool	Date Analyzed:	10-29-08
Condition:	Intact	Chain of Custody:	5618

Parameter	Concentration (mg/Kg)
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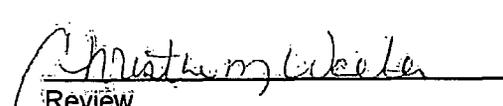
Total Chloride

30.0

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: A.L. Elliott B #3.

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review

# CHAIN OF CUSTODY RECORD

5618

Client: <i>Blago / BP</i>	Project Name / Location: <i>A.L. ELLIOTT B<sup>#</sup> 3</i>	ANALYSIS / PARAMETERS											
Client Address:	Sampler Name: <i>JEFF BLAGO</i>	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RGI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	Sample Cool	Sample Intact
Client Phone No.:	Client No.:												

Sample No./ Identification	Sample Date	Sample Time	Lab. No.	Sample Matrix	No./Volume of Containers	Preservative		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RGI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	Sample Cool	Sample Intact
						HgO <sub>2</sub>	HCl												
<i>5 pt @ 5' @ TB</i>	<i>10/23/08</i>	<i>1345</i>	<i>47873</i>	<i>Soil / Sludge / Aqueous</i>	<i>1 - 4oz</i>				<b>X</b>							<b>X</b>	<b>X</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
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				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															
				Soil / Sludge / Aqueous															

Relinquished by: (Signature) <i>Jeff Blago</i>	Date <i>10/24/08</i>	Time <i>1103</i>	Received by: (Signature) <i>[Signature]</i>	Date <i>10/24/08</i>	Time <i>1103</i>
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		



5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505-632-0615

# ENVIROTECH LABS

PRactical SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS  
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	10-30-08
Laboratory Number:	10-27-TPH.QA/QC 47830	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	10-27-08
Preservative:	N/A	Date Extracted:	10-27-08
Condition:	N/A	Analysis Needed:	TPH

<b>Calibration</b>	I-Cal Date:	C-Cal Date:	I-Cal RF:	C-Cal RF:	% Difference:	Accept. Range:
	10-06-08	10-27-08	1,770	1,750	1.1%	+/- 10%

<b>Blank Conc. (mg/Kg)</b>	Concentration:	Detection Limit:
TPH	ND	9.9

<b>Duplicate Conc. (mg/Kg)</b>	Sample:	Duplicate:	% Difference:	Accept. Range:
TPH	12.8	10.6	17.2%	+/- 30%

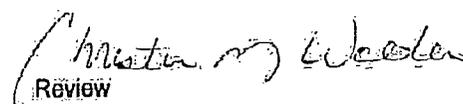
<b>Spike Conc. (mg/Kg)</b>	Sample:	Spike Added:	Spike Result:	% Recovery:	Accept Range:
TPH	12.8	2,000	2,130	106%	80 - 120%

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Store No. 4551, 1978.

Comments: QA/QC for Samples 47828, 47830, 47873 and 47875.

  
Analyst

  
Review



EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	10-28-BT QA/QC	Date Reported:	10-29-08
Laboratory Number:	47828	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-28-08
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF	C-Cal RF	% Diff	Blank Conc	Detect Limit
		Accept Range	0 - 15%		
Benzene	4.8971E+007	4.9069E+007	0.2%	ND	0.1
Toluene	3.6215E+007	3.6287E+007	0.2%	ND	0.1
Ethylbenzene	2.7584E+007	2.7639E+007	0.2%	ND	0.1
p,m-Xylene	5.9847E+007	5.9967E+007	0.2%	ND	0.1
o-Xylene	2.7347E+007	2.7402E+007	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	% Diff	Accept Range	Detect Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	4.0	4.1	2.5%	0 - 30%	1.0
Ethylbenzene	2.5	2.4	4.0%	0 - 30%	1.0
p,m-Xylene	5.5	5.6	1.8%	0 - 30%	1.2
o-Xylene	3.1	2.9	6.5%	0 - 30%	0.9

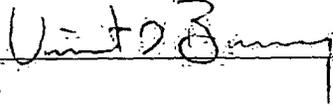
Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	50.0	49.0	98.0%	39 - 150
Toluene	4.0	50.0	49.0	90.7%	46 - 148
Ethylbenzene	2.5	50.0	50.5	96.2%	32 - 160
p,m-Xylene	5.5	100	98	92.4%	46 - 148
o-Xylene	3.1	50.0	50.1	94.4%	46 - 148

ND - Parameter not detected at the stated detection limit.

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

Comments: QA/QC for Samples 47828, 47830, 47873, 47891, 47892, 47894, 47895, 47897, and 47907.

Analyst 

Review 

**505-947-9900**

**BP AMERICA PRODUCTION COMPANY**

**A L ELLIOTT B 003**

**API 3004508609 LEASE NMSF078132**

**660 FNL 590 FWL (D) SEC 10 T29N R9W**

**San Juan County ELEV 5815**

**LAT 36° 44' 41.280"**

**LONG -107° 46' 23.448"**

