Form C-144 Revised June 6, 2013

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 8750

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.

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.

Fe, NM 87505	Santa Fe, NM 87505	Environmental Bureau office and provide to the appropriate NMOCD District Office
	Pit, Below-Grade Tank, or	
Proposed Alter	rnative Method Permit or Closur	e 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 or proposed alternative method	low-grade tank,	
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternativ	ve request	
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water invironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rule.	es, regulations or ordina	
Operator: BP America Production Company OGRID #:778  Address: 200 Energy Court, Farmington, NM 87401	OII CONC DIV.	
Address:200 Energy Court, Farmington, NM 87401	AIF COMS. DIA D	IST.
Facility or well name:Warren A LS 1	AUG 1 5 2014	4
API Number:3004507142OCD Permit Number:	·•	•
U/L or Qtr/QtrKSection25Township28NRange9WCounty:San Juan		
Center of Proposed Design: Latitude 36.63101 Longitude -107.74290 NAD:		
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 □ Lined □ Unlined □ Liner type: Thickness mil □ LLDPE □ HDPE □ PVC □ Other □ String-Reinforced		
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L	x Wx D	_
3.   Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A  Volume:95.0bbl 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 bottomed; side walls not	t 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 contact of the Santa Fe Environmental Bureau offic	nsideration of approval	al.

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school,	, hospital,
institution or church)  Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	•
6.	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other	
Monthly inspections (If netting or screening is not physically feasible)	
7.	
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	
Gigned in compliance with 15.15.10.0 NAME	
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 acce,	ntabla sourca
material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	piuvie source
C1-22	
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
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No
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	
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	☐ Yes ☐ No
Society; Topographic map	
Within a 100-year floodplain. (Does not apply to below grade tanks)  - FEMA map	
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured	Yes No
from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Oil Conservation Division

Page 2 of 6

Form C-144

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
	Li res Li 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 docattached.	
Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
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 docattached.	cuments are
<ul> <li>□ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>□ A List of wells with approved application for permit to drill associated with the pit.</li> <li>□ 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</li> <li>□ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC</li> </ul>	.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:	

Form C-144

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.	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	1. (11) A
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 Alternative Closure Method	luid Management Pit
14. Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be	attached to the
closure plan. Please indicate, by a check mark in the box, that the documents are attached.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. 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 Division	☐ Yes ☐ No
Within an unstable area.  - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	_
Society; Topographic map Within a 100-year floodplain.	☐ Yes ☐ No
- 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 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 19.15.17.13 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  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 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
17. 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): Title:	
Signature: Date:	
e-mail address: Telephone:	
e-mail address: Telephone:  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 91/5  Title: GAP Parce OCD Permit Number:	
e-mail address:    Telephone:	the closure report.
e-mail address:    Telephone:	the closure report.
Telephone:   Telephone:   18.   OCD Approval:   Permit Application (including closure plan)   Closure Plan (only)   OCD Conditions (see attachment)   OCD Representative Signature:   Approval Date:   9/1/2	the closure report.

22. Operator Closure Certification:	
I hereby certify that the information and attachments submitted	with this closure report is true, accurate and complete to the best of my knowledge and e closure requirements and conditions specified in the approved closure plan.
Name (Print):Jeff Peace	Title: Area Environmental Advisor
Signature: Iff Pene	Date:August 15, 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

# Warren A LS 1 API No. 3004507142 Unit Letter K, Section 25, T28N, 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 approve 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.
  - Notice is attached.
- 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.

#### Notice is attached.

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

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 with in 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 covered by the LPT and 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 covered by the LPT and 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 covered by the LPT and 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 as part of final reclamation.

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 revegetation.

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.

<u>District 1</u> 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

Revised August 8, 2011

Form C-141

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.

			Rele	ease Notific	catio	n and Co	rrective A	etion			
						<b>OPERA</b>	ГOR	☐ Initi	al Report 🔃 Final Report		
Name of Co						Contact: Jeff Peace					
		Court, Farmi	ington, N	M 87401			No.: 505-326-94				
Facility Na	me: warre	n A LS I				Facility Type: Natural gas well					
Surface Ow	ner: Feder	al .		Mineral (	Owner:	Federal		API No	. 3004507142		
LOCATI						N OF RE	LEASE				
Unit Letter	Section	Township	Range	Feet from the		h/South Line	Feet from the	East/West Line	County: San Juan		
K	25	28N	9W	1,850	South	h	1,650	West			
		Lat	∟ itude3	6.63101		Longitud	e107.74290_		<u> </u>		
				NAT	TURE	OF REL	EASE				
Type of Rele						Volume of	Release: N/A		Recovered: N/A		
Source of Re	elease: belov	w grade tank –	- 95 bbl			Date and I- N/A	Iour of Occurrence	Date and	Hour of Discovery: N/A		
Was Immedi	ate Notice (		Yes [	No Not R	equirec	If YES, To	Whom?				
By Whom?						Date and I-					
Was a Water	course Read		Yes 🗵	] No		If YES, Vo	olume Impacting t	the Watercourse.	·		
Describe Car the BGT. So	use of Probl oil analysis r	esulted in TP	dial Actio H, BTEX	n Taken.* Sampli and chlorides belo	ow stan	idards. Analys	is results are attac	ched.	to ensure no soil impacts from		
backfilled an	d compacte	d and is still w	vithin the a	active well area.				·	he area under the BGT was		
regulations a public health should their or the enviro	Il operators or the envi operations h nment. In a	are required to ronment. The lave failed to a	o report an acceptant adequately OCD accep	nd/or file certain reports of a C-141 reports and repo	elease ort by the emedia	notifications a he NMOCD m te contaminati	nd perform correct arked as "Final R on that pose a thr	ctive actions for rele eport" does not rele eat to ground water	tuant to NMOCD rules and cases which may endanger eve the operator of liability surface water, human health compliance with any other		
Signature: Off Posee						OIL CONSERVATION DIVISION  Approved by Environmental Specialist:					
Printed Nam	e: Jeff Peac	<u>e</u>									
Title: Area E	nvironment	al Advisor				Approval Da	e:	Expiration	Date:		
E-mail Addr	ess: peace.je	effrey@bp.cor	n			Conditions of	Approval:		Attached		
Date: August 15, 2014 Phone: 505-326-9479											

<sup>\*</sup> Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413	API#: 3004507142
	(505) 632-1199	TANK ID (if applicble):
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE #: 1 of 1
SITE INFORMATION	I: SITE NAME: WARREN A LS # 1	DATE STARTED: 07/02/14
QUAD/UNIT: K SEC: 25 TWP:	28N RNG: 9W PM: NM CNTY: SJ ST: NM	DATE FINISHED:
1/4-1/4/FOOTAGE: 1,850'S / 1,65	ELKHOBN	ENVIRONMENTAL SPECIALIST(S): JCB
	PROD. FORMATION: MV/PC CONTRACTOR: MBF - S. GENTRY	
REFERENCE POINT	30.03000 X 107.743	
	GPS COORD: 36.63101 X 107.74290 DISTANCE	
	GPS COORD.: DISTANCE	BEARING FROM W.H.:BEARING FROM W.H.:
	GPS COORD: DISTANCE:	
SAMPLING DATA:	The second secon	OVM READING
	(2) 5' SAMPLE DATE: 07/02/14 SAMPLE TIME: 1450 LAB ANALYSIS: 418.	(mqq)
_ ·	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
4) SAMPLE ID:	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION	SOIL TYPE: SAND/ SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER	
SOIL COLOR: DARK YELL		/ COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC
COHESION (ALL OTHERS): NON COHESIVE / SLIGHTL	· · · · · · · · · · · · · · · · · · ·	
CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY/SLIGHTLY MOIST MOIST/W		
SAMPLE TYPE: GRAB COMPOSITE -		PLANATION -
DISCOLORATION/STAINING OBSERVED: YES		
	LOST INTEGRITY OF EQUIPMENT: YES NO EXPLANATION -	
	DAND/OR OCCURRED: YES NO EXPLANATION: YES NO EXPLANATION - LOW PROFILE ABOVE-GRADE TANK TO BE SET ATO	P RCT POSITION
OTHER:	TEST NO EXIDENTION - CONTROLLER ABOVE-SINABLE TARK TO BE SET ATO	F BOT FOOTHON.
SOIL IMPACT DIMENSION ESTIMATION:		ESTIMATION (Cubic Yards) : NA
.4661		MOCD TPH CLOSURE STD: 100 ppm
SITE SKETCH	BGT Located : off on site PLOT PLAN circle: attached	
		DVM CALIB. READ. = <b>53.0</b> ppm   RF =0.52 DVM CALIB. GAS = <b>100</b> ppm
		IME: <u>6:30</u> (am)pm DATE: <u>07/02/14</u>
	PROD. TANK	MISCELL. NOTES
	<b>V</b> ← BERM	wo: N15499936
	PBGTL (X)	PO #:
	T.B. ~ 5'	PK: ZEVH01BGT2
		PJ#: <b>Z2-006Q0</b>
		Permit date(s): 06/10/10
	SEPARATOR	OCD Appr. date(s): 06/27/14  Tank OVM = Organic Vapor Meter
	TO :	D ppm = parts per million  BGT Sidewalls Visible: Y (N)
<b>W.H.</b> ⊕	TO METER X - S.P.D.	BGT Sidewalls Visible: Y / N
_	RUN Y - S.F.D. ON DEPRESSION; B.G. = BELOW GRADE; B = BELOW, T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD;	BGT Sidewalls Visible: Y / N
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL	OW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	Magnetić declination: 10° E
NOTES:	WALL; DW-DOUBLE WALL; SB-SINGLE BUTTOM, DB-DOUBLE BUTTOM, DB-DOUBLE BUTTOM, DB-DOUBLE BUTTOM, DT-DOUBLE BUTTOM, DB-DOUBLE BUTTOM, DB-DOUBL	



PO Box 22024

Tulsa OK, 74121-2024

Project Name:

Warren A LS 1

Project Number:

03143-0424

Project Manager: Jeff Blagg

Reported:

03-Jul-14 14:53

# **Analyical Report for Samples**

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
95 BGT 5-pt @5'	P407019-01A	Soil	07/02/14	07/02/14	Glass Jar, 4 oz.



Tulsa OK, 74121-2024

Project Name:

Warren A LS 1

PO Box 22024

Project Number: Project Manager: 03143-0424

Jeff Blagg

**Reported:** 03-Jul-14 14:53

# 95 BGT 5-pt @5' P407019-01 (Solid)

·		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	•
Toluene	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
Ethylbenzene	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
p,m-Xylene	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
o-Xylene	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
Total Xylenes	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
Total BTEX	ND	0.05	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8021B	
Surrogate: Bromochlorobenzene		103 %	80-	-120	1427020	07/02/14	07/02/14	EPA 8021B	
Surrogate: 1,3-Dichlorobenzene		98.0 %	80-	-120	1427020	07/02/14	07/02/14	EPA 8021B	
Nonhalogenated Organics by 8015								,	
Gasoline Range Organics (C6-C10)	ND	4.99	mg/kg	1	1427020	07/02/14	07/02/14	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	29.9	mg/kg	1	1427019	07/02/14	07/02/14	EPA 8015D	
Total Petroleum Hydrocarbons by 418.1									
Total Petroleum Hydrocarbons	ND	20.0	mg/kg		1427021	07/03/14	07/03/14	EPA 418.1	
Cation/Anion Analysis									
Chloride	ND	9.98	mg/kg	I	1427022	07/03/14	07/03/14	EPA 300.0	



Project Name:

Warren A LS 1

PO Box 22024

Tulsa OK, 74121-2024

Project Number: Project Manager: 03143-0424

Jeff Blagg

**Reported:** 03-Jul-14 14:53

#### Volatile Organics by EPA 8021 - Quality Control

#### **Envirotech Analytical Laboratory**

	Reporting			Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1427020 - Purge and Trap EPA 5030A										
Blank (1427020-BLK1)				Prepared &	Analyzed:	02-Jul-14				
Benzene	ND	0.05	mg/kg							
Toluene	ND	0.05	11							
Ethylbenzene	ND	0.05	n							
o,m-Xylene	ND	0.05	**							
p-Xylene	ND	0.05	**							
Total Xylenes	ND	0.05	. "							
Total BTEX	ND	0.05	u							
Surrogate: 1,3-Dichlorohenzene	42.0		ug/L	50.0		84.0	80-120			
Surrogate: Bromochlorobenzene	43.4		n	50.0		86.8	80-120			
Duplicate (1427020-DUP1)	Sou	rce: P407018-	01	Prepared &	: Analyzed:	02-Jul-14				
Benzene	ND	0.05	mg/kg		ND			,	30	
oluene	ND	0.05	**		ND				30	
Ethylbenzene	ND	0.05	**		ND				30	
o,m-Xylene	ND	0.05	15		ND			d	30	
p-Xylene	ND	0.05	"		ND				30	
Surrogate: 1,3-Dichlorobenzene	49.7		ug/L	50.0		99.5	80-120			
lurrogate: Bromochlorobenzene	51.4		u	50.0		103	80-120			
Matrix Spike (1427020-MS1)	Sou	rce: P407018-	01	Prepared &	: Analyzed:	02-Jul-14				
3enzene	49.2		ug/L	50.0	ND	98.4	39-150			
oluene	49.5		u	50.0	ND	99.0	46-148			
Ethylbenzene	48.2		II.	50.0	ND	96.5	32-160			
,m-Xylene	97.7		u	100	ND	97.7	46-148			
-Xylene	49.2		u	50.0	ND	98.3	46-148			
urrogate: 1,3-Dichlorobenzene	49.5		"	50.0		99.0	80-120			
Surrogate: Bromochlorobenzene	50.9		"	50.0		102	80-120			

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5796 US Highway 64, Farmington, NM 87401

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

envirotech-inc.comlaboratory@envirotech-inc.com



Project Name:

Warren A LS 1

PO Box 22024

Tulsa OK, 74121-2024

Project Number: Project Manager: 03143-0424

Jeff Blagg

Reported:

03-Jul-14 14:53

#### Nonhalogenated Organics by 8015 - Quality Control

#### **Envirotech Analytical Laboratory**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1427019 - DRO Extraction EPA 3550C										
Blank (1427019-BLK1)										
Diesel Range Organics (C10-C28)	ND	30.0	mg/kg							
Duplicate (1427019-DUP1)	Sour	ce: P407018-	01	Prepared &	: Analyzed:	02-Jul-14				
Diesel Range Organics (C10-C28)	ND	29.9	mg/kg		ND				30	
Matrix Spike (1427019-MS1)	Sour	ce: P407018-0	Prepared: 0	2-Jul-14 A	nalyzed: 0	3-Jul-14				
Diesel Range Organics (C10-C28)	248		mg/L	250	7.32	96.1	75-125			,



Tulsa OK, 74121-2024

Project Name:

Warren A LS I

PO Box 22024

Project Number:

03143-0424

Project Manager:

Jeff Blagg

Reported: 03-Jul-14 14:53

### Nonhalogenated Organics by 8015 - Quality Control

# **Envirotech Analytical Laboratory**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1427020 - Purge and Trap EPA 5030A										
Blank (1427020-BLK1)				Prepared &	Analyzed:	02-Jul-14				
Gasoline Range Organics (C6-C10)	ND	5.00	mg/kg						•	
Duplicate (1427020-DUP1)	Soui	rce: P407018-	01	Prepared & Analyzed: 02-Jul-14						
Gasoline Range Organics (C6-C10)	ND	4.99	mg/kg		ND				30	
Matrix Spike (1427020-MS1)	Source: P407018-01			Prepared &	: Analyzed:	02-Jul-14				
Gasoline Range Organics (C6-C10)	0.43		mg/L	0.450	ND	94.4	75-125			



Tulsa OK, 74121-2024

Project Name:

Warren A LS 1

PO Box 22024

Project Number: Project Manager: 03143-0424

Jeff Blagg

Reported:

03-Jul-14 14:53

#### Total Petroleum Hydrocarbons by 418.1 - Quality Control

#### **Envirotech Analytical Laboratory**

Reporting			Spike	Source		%REC		RPD	
Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
								*	
ND	20.0	mg/kg							
Source	ce: P407019-	01	Prepared &	Analyzed:	03-Jul-14				
ND	20.0	mg/kg		ND				30	
Source: P407019-01 Pro			Prepared &	Analyzed:	03-Jul-14				
1880	20.0	mg/kg	2020	ND	93.1	80-120			
	ND Sour ND Sour	ND 20.0  Source: P407019-  ND 20.0  Source: P407019-	ND 20.0 mg/kg  Source: P407019-01  ND 20.0 mg/kg  Source: P407019-01	Prepared & ND 20.0 mg/kg  Source: P407019-01 Prepared & ND 20.0 mg/kg  Source: P407019-01 Prepared &	Prepared & Analyzed:  ND 20.0 mg/kg  Source: P407019-01 Prepared & Analyzed:  ND 20.0 mg/kg ND  Source: P407019-01 Prepared & Analyzed:	Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg  Source: P407019-01 Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg ND  Source: P407019-01 Prepared & Analyzed: 03-Jul-14	Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg  Source: P407019-01 Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg ND  Source: P407019-01 Prepared & Analyzed: 03-Jul-14	Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg  Source: P407019-01 Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg ND  Source: P407019-01 Prepared & Analyzed: 03-Jul-14	Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg  Source: P407019-01 Prepared & Analyzed: 03-Jul-14  ND 20.0 mg/kg ND 30  Source: P407019-01 Prepared & Analyzed: 03-Jul-14



Project Name:

Warren A LS I

PO Box 22024

Tulsa OK, 74121-2024

Project Number:
Project Manager:

03143-0424

Jeff Blagg

Reported:

03-Jul-14 14:53

#### Cation/Anion Analysis - Quality Control

#### **Envirotech Analytical Laboratory**

	Reporting			Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1427022 - Anion Extraction EPA 300.0										
Blank (1427022-BLK1)			Prepared &	03-Jul-14						
Chloride	ND	9.96	mg/kg							
LCS (1427022-BS1)				Prepared &	Analyzed:	03-Jul-14				
Chloride	495	9.94	nıg/kg	497		99.6	90-110			
Matrix Spike (1427022-MS1)	Sour	ce: P407018-	01	Prepared &	Analyzed:	03-Jul-14				
Chloride	503	9.97	mg/kg	499	ND	101	80-120			
Matrix Spike Dup (1427022-MSD1)	Sour	Source: P407018-01			Prepared & Analyzed: 03-Jul-14					
Chloride	497	9.86	mg/kg	493	ND	101	80-120	1.24	20	<del>-</del>



Tulsa OK, 74121-2024

Project Name:

Warren A LS 1

PO Box 22024

Project Number:

03143-0424

Project Manager: Jeff Blagg

Reported:

03-Jul-14 14:53

#### Notes and Definitions

DET Analyte DETECTED

ND

Analyte NOT DETECTED at or above the reporting limit

NR

Not Reported

dry

Sample results reported on a dry weight basis

RPD

Relative Percent Difference

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5796 US Highway 64, Farmington, NM 87401

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

envirotech-inc.com

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

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

laboratory@envirotech-inc.com

# CHAIN OF CUSTODY RECORD

17186

Client: Blagg Englineer BP America	<i>''</i> ට	Pi	Project Name / Location:  WARREN A LS 1							ANALYSIS / PARAMETERS																											
Email results to: jeffc blogg Peace. jeffrey @ B Client Phone No.: 505 - 320 - 1	Client No.:				Email results to: jeffc blogg @ AOC . Com Sampler Name:  Peace . jeffrey @ BP. Com Teff Bl  Client Phone No.:  Client No.:					Sampler Name					VOC (Method 8260)	RCRA 8 Metals	Anion		ith H/P	le 910-1	8.1)	IDE				Cool	Intact										
Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers		No./Volume		No./Volume		No./Volume		No./Volume		No./Volume		No./Volume		No./Volume		Pr HNO <sub>3</sub>	eservat HCI	ve	TPH (Method 8015)	BTEX (Method 8021)	VOC (M	RCRA 8	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
95 BGT 5-pe @ 5'	72/14	1455	P407019-01	12	402				×	×							X	X				1	A														
								_														_															
}								<u> </u>				-		A	SA	Ρ						$\dashv$															
						-							. [s	l	2 E	VH	01	- Ba	7	2																	
								_																													
Relinquished by: (Signature)  Relinquished by: (Signature)	.1.	I	7	Date 2/4	Time 1610	Recei					7				4			<u> </u>			Date	1	me 10														
Sample Matrix Soil X Solid  Sludge	Aqueous [	] Other[										_									-																
☐ Sample(s) dropped off after	hours to se	cure drop			Ana						_		0.8		1																						





**BP America Production Company** 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

June 24, 2014

Bureau of Land Management Mark Kelly 6251 College Blvd Suite A Farmington, NM 87402

#### VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank

Well Name: WARREN A LS 001

API#: 3004507142

Dear Mr. Kelly,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about June 27, 2014. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at 505-326-9214

Sincerely,

Jerry Van Riper Surface Land Negotiator

9Dockie

**BP America Production Company** 

### **BP America Production Company**

200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

# SENT VIA E-MAIL TO: BRANDON.POWELL@STATE.NM.US

June 24, 2014

New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

WARREN A LS 001 API 30-045-07142 (G) Section 25- T28N - R09W San Juan County, New Mexico

Dear Mr. Brandon Powell:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95 bbl BGT that will no longer be operational at this well site.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Jeff Peace

**BP Field Environmental Advisor** 

(505) 326-9479



