District I 1625 W. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application OIL CONS. DIV DIST. 3
Type of action: 39-26542 Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: ConocoPhillips Company OGRID #: 217817
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: San Juan 29-5 Unit 49A
API Number: 30-039-26542 OCD Permit Number:
U/L or Qtr/Qtr F Section 09 Township 29N Range 05W County: Rio Arriba Center of Proposed Design: Latitude 36.740267 N Longitude -107.366639 W 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.
Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 40 bbl Type of fluid: Produced Water
Tank Construction material: Metal
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other
Liner type: Thickness 45mil
4.
Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
5.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)
Four foot height, four strands of barbed wire evenly spaced between one and four feet

Alternate. Please specify

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other	
☐ Monthly inspections (If netting or screening is not physically feasible)	
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC	
8.	
Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: □ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. □ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	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. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ⊠ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	☐ Yes ☐ No
application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
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 Natructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 (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:	NMAC 15.17.9 NMAC
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. 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

**	
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B 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 H₂S, 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	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fl	luid Management Pit
Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	and management it
14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	attached to the
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. P 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence 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 FEMA map	☐ Yes ☐ No ☐ 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. Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards 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
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 bel	ief.
Name (Print): Title:	
Signature: Date:	
e-mail address:	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 9//	5/15
Y	
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date:	
Closure Method: Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-logical of the different from approved plan, please explain.	oop systems only)
Closure Report Attachment Checklist: _Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached. □ Proof of Closure Notice (surface owner and division) □ Proof of Deed Notice (required for on-site closure for private land only) □ Plot Plan (for on-site closures and temporary pits) □ Confirmation Sampling Analytical Results (if applicable) □ Waste Material Sampling Analytical Results (required for on-site closure) □ Disposal Facility Name and Permit Number □ Soil Backfilling and Cover Installation □ Re-vegetation Application Rates and Seeding Technique □ Site Reclamation (Photo Documentation)	dicate, by a check

Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report is belief. I also certify that the closure complies with all applicable closure requirements and	
Name (Print): Arleen White Title: Staff Regulatory Technician	a conditions specified in the approved closure plan.
Signature: Allen White	Date: 7/23 15
Signature:	Date: 1/23 (13
e-mail address: Arleen.R. White@conocophillips.com Telephone: (505) 326-9517	

ConocoPhillips Company San Juan Basin Below Grade Tank Closure Report

Lease Name: San Juan 29-5 Unit 49A

API No.: 30-039-26542

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

- COPC shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13
 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of
 Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five
 years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier
 date that the division requires because of imminent danger to fresh water, public health or the environment. For any
 closure, BR will file the C144 Closure Report as required.
- 2. The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.
- 3. COPC shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.
 - All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.
- 4. COPC Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.
 - The below-grade tank was disposed of in a division-approved manner.
- 5. If there is any on-site equipment associated with a below-grade tank, then COPC shall remove the equipment, unless the equipment is required for some other purpose.
 - All on-site equipment associated with the below-grade tank was removed.
- 6. COPC will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If COPC or the division determines that a release has occurred, then COPC shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then COPC shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

11. The surface owner shall be notified of COPC's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. COPC Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative

approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation (See Report)
 - Re-vegetation application rates and seeding techniques (See Report)
 - Photo documentation of the site reclamation (Included as an attachment)
 - Confirmation Sampling Results (Included as an attachment)
 - Proof of closure notice (Included as an attachment)

White, Arleen R

From:

Munkres, Travis W

Sent:

Wednesday, June 24, 2015 8:18 AM

To:

Journey, Denise D; Notor, Lori

Cc:

Becker, Joey W; Munkres, Travis W

Subject:

RE: 72-Hour Notification of BGT Closure - SJ 29-5 Unit 49A

Denise,

Please send an update to the OCD that this has changed to Tuesday, June 30, 2015 @ 12:00 (Noon)

Thanks, Travis

From: Journey, Denise D

Sent: Tuesday, June 23, 2015 8:53 AM

To: Smith, Cory, EMNRD

Cc: Powell, Brandon, EMNRD; Kelly, Mark; Munkres, Travis W; GRP:SJBU Regulatory

Subject: 72-Hour Notification of BGT Closure - SJ 29-5 Unit 49A

Subject: 72 Hour notice of BGT Closure for the San Juan 29-5 Unit 49A

Anticipated Start Date: Monday, June 29, 2015 @ approximately 12:00 (Noon)

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name:

San Juan 29-5 Unit 49A

API#:

30-039-26542

Location:

UL F, Sec. 9, T29N, R5W

Footages:

1850' FNL & 1450' FWL

Operator:

COP

Surface Owner: BLM

We have received the approved Closure Plan from Santa Fe and it is posted on OCD online.

Denise Journey
Staff Regulatory Technician
ConocoPhillips Company
505-326-9556
505-215-1750

Denise.Journey@conocophillips.com

Solutions to Regulations for Industry —

July 15, 2015

Ms. Lisa Hunter ConocoPhillips San Juan Business Unit 5525 Highway 64 Farmington, New Mexico 87401

Re: San Juan 29-5 Unit 49A

Below Grade Tank Closure Sampling Report

Dear Ms. Hunter:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips San Juan 29-5 Unit 49A, located in Unit Letter F, Section 9, Township 29N, Range 5W in Rio Arriba County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from beneath the BGT on June 30, 2015. A topographic map of the location is included as Figure 1 and an aerial site map is included as Figure 2.

BGT Summary

Site Name – San Juan 29-5 Unit 49A

Location – Unit Letter F, Section 9, Township 29N, Range 5W

API Number – 30-039-26542

Wellhead Latitude/Longitude – N36.74228 and W107.36674

BGT Latitude/Longitude – N36.74203 and W107.36667

Land Jurisdiction – Bureau of Land Management

Size of BGT – 45 barrels

Site Ranking – 0 per New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills, and Releases (August 1993)

Date of BGT Closure Soil Sampling – June 30, 2015

BGT Closure Standards

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the San Juan 29-5 Unit 49A are as follows: 0.2 mg/kg benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 100 mg/kg total petroleum hydrocarbons (TPH).

Field Activities

On June 30, 2015, following removal of the BGT tank and gravel, Rule personnel conducted a visual inspection for surface/subsurface indications of a release. No evidence of a release was observed. Rule personnel then collected five soil samples (S-1 through S-5) from 0.5 feet beneath the BGT liner. Figure 2 provides

Ms. Lisa Hunter San Juan 29-5 Unit 49A July 15, 2015 Page 2 of 3

the location of the soil samples collected from below the BGT. The field work summary sheet is attached.

Soil Sampling

The five soil samples (S-1 through S-5) collected from below the BGT liner were combined to create soil confirmation sample SC-1. A portion of SC-1 was field screened for volatile organic compounds (VOCs) and chlorides, and field analyzed for total petroleum hydrocarbons (TPH) per U.S. Environmental Protection Agency (USEPA) Method 418.1.

The portion of SC-1 collected for laboratory analysis was placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The sample was analyzed for BTEX per USEPA Method 8021B, TPH per USEPA Method 418.1, and chlorides per USEPA Method 300.0.

Field sampling results for soil confirmation sample SC-1 reported VOCs at 3.0 ppm and TPH concentrations at 30.3 mg/kg. Field chloride concentrations were reported at 80 mg/kg. Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations as less than 0.050 mg/kg and 0.25 mg/kg, respectively. Laboratory analytical results for SC-1 reported concentrations of less than 20.0 mg/kg TPH and less than 7.5 mg/kg chloride. Field and laboratory results for SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On June 30, 2015, BGT closure sampling activities were conducted at the ConocoPhillips San Juan 29-5 Unit 49A. Field and laboratory results for sample SC-1 were reported below the BGT closure standards for benzene, total BTEX, TPH, and chlorides as outlined in 19.15.17.13.NMAC. Based on field sampling and laboratory analytical results, no release occurred from the BGT and no further work is recommended.

Rule Engineering appreciates the opportunity to provide services to ConocoPhillips. If you have any questions, please contact me at (505) 325-1055.

Sincerely.

Rule Engineering, LLC

Anah Water

Deborah Watson, PG



Ms. Lisa Hunter San Juan 29-5 Unit 49A July 15, 2015 Page 3 of 3

Attachments:

Table 1. BGT Soil Sampling Results Figure 1. Topographic Map Figure 2. Aerial Site Map Field Work Summary Sheet Analytical Laboratory Report

Table 1. BGT Soil Sampling Results San Juan 29-5 Unit 49A Rio Arriba County, New Mexico ConocoPhillips

				Field Sampling Results			Laboratory Analytical Results			
Sample Sample Depth				VOCs (PID)	TPH	Chloride	Benzene	Total BTEX	TPH	Chloride
Sample ID	Date	Type	(ft below BGT liner)	(ppm)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
BGT Closure Standards*					100	250	0.2	50	100	250
SC-1 Jun 30, 15 composite 0.5			3.0	30.3	80	<0.050	<0.25	<20.0	<7.5	

Notes:

PID - photo-ionization detector

ppm - parts per million

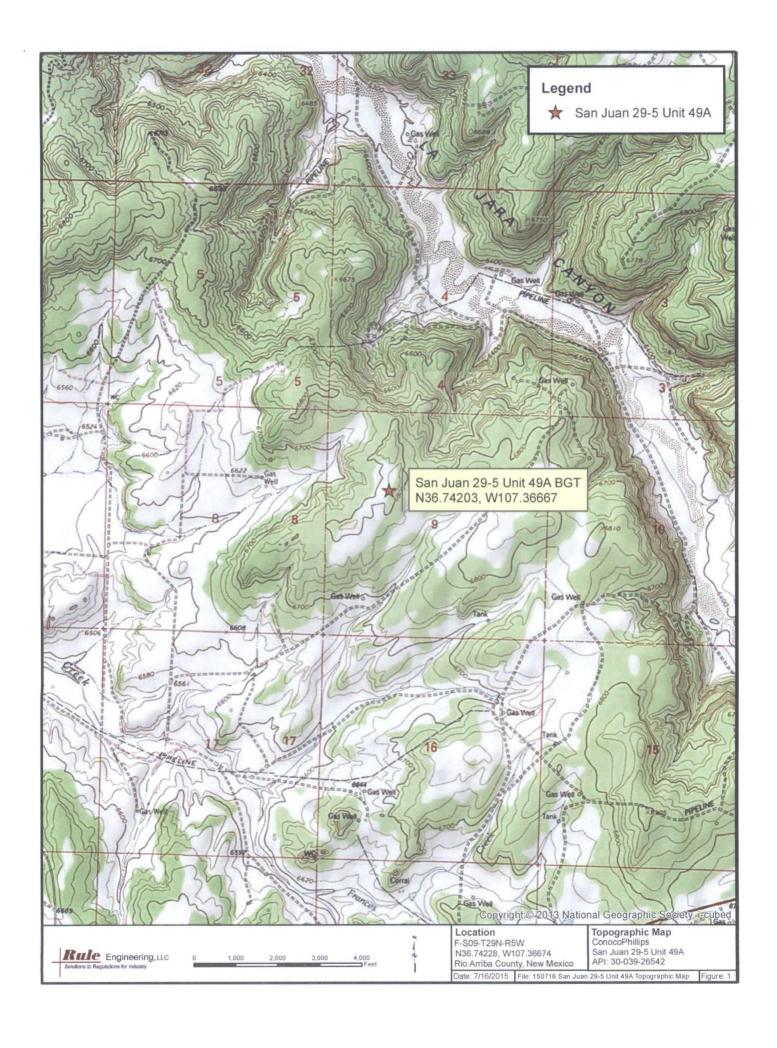
mg/kg - milligrams/kilograms

VOCs - volatile organic compounds

TPH-total petroleum hydrocarbons per USEPA Method 418.1

BTEX - benzene, toluene, ethylbenzene, and total xylenes

*19.15.17.13 NMAC





Rule Engineerning Field Work Summary Sheet

Company:	ConocoPhillips	
Location:	San Juan 29-5 Unit 49A	
API:	30-039-26542	
Legals:	F-S09-T29N-R5W	
County:	Rio Arriba	
Land Jurisd	iction: BLM	

Date: 30-Jun-15 Staff: Chris Bak Debbie Watson

Site Rank

Wellhead GPS: 36.74228, -107.36674 BGT GPS: 36.74203, -107.36667

Siting Information based on BGT Location:

Groundwater: Elevation differential location and wash in La Jara Canyon (>100 ft)

Surface Water: Carrizo Wash located 1,200 feet west of location

Wellhead Protection: No wells

Objective: Closure sampling for BGT

Tank Size: 45 bbls (removed while onsite)
Liner: No. 4-6 inches of gravel below tank

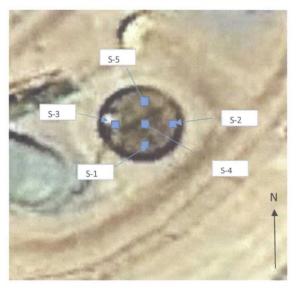
Observations: No staining or indication of a release. A little damp below tank on NE side.

Notes: Jonathon Kelly, NMOCD, on site during sampling activities.

Field Sampling Information

	Type of	Collection	Collection	VOCs ¹	VOCs	TPH ²	TPH	Chloride ³	Chloride
Name	Sample	Time	Location	(ppm)	time	mg/kg	Time	mg/kg	Time
SC-1	composite	12:10	see below	3.0	12:20	30.3	12:36	80	12:40

SC-1 is a 5-point composite of S-1 through S-5, collected 0.5 ft below tank liner. Sample SC-1 was laboratory analyzed for TPH (418.1), BTEX (8021) and chlorides (300.0).



Field Sampling Notes:

³Field screening for chlorides was conducted using the Hach chloride low range test kit. Chloride concentrations are determined by drop count titration method using silver nitrate titrant.



¹ Field screening for volatile organic compounds (VOC) vapors was conducted with a photo-ionization detector (PID). Before beginning field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas.

² Field analysis for TPH was conducted using a total hydrocarbon analyzer. Prior to field analysis, the machine was calibrated following the manufacturer's procedure which includes calculation of a calibration curve using known concentration standards.



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

OrderNo.: 1507083

July 14, 2015

Deborah Watson Rule Engineering LLC 501 Airport Dr., Ste 205 Farmington, NM 87401 TEL: (505) 860-2712

FAX

RE: San Juan 29-5 Unit 49A

Dear Deborah Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 7/1/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

Only

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order 1507083

Date Reported: 7/14/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Rule Engineering LLC

Project: San Juan 29-5 Unit 49A

Lab ID: 1507083-001

Client Sample ID: SC-1

Collection Date: 6/30/2015 12:10:00 PM

Received Date: 7/1/2015 7:15:00 AM

Analyses	Result		al Units	DF	Date Analyzed	Batch	
EPA METHOD 418.1: TPH					Analys	t: TOM	
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	7/2/2015	20077	
EPA METHOD 300.0: ANIONS					Analys	t: LGT	
Chloride	ND	7.5	mg/Kg	5	7/9/2015 1:39:53 PM	20182	
EPA METHOD 8021B: VOLATILES					Analys	t: NSB	
Benzene	ND	0.050	mg/Kg	1	7/7/2015 1:17:00 AM	20074	
Toluene	ND	0.050	mg/Kg	1	7/7/2015 1:17:00 AM	20074	
Ethylbenzene	ND	0.050	mg/Kg	1	7/7/2015 1:17:00 AM	20074	
Xylenes, Total	ND	0.10	mg/Kg	1	7/7/2015 1:17:00 AM	20074	
Surr: 4-Bromofluorobenzene	87.6	80-120	%REC	1	7/7/2015 1:17:00 AM	20074	

Matrix: SOIL

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

Page 1 of 4

- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1507083

14-Jul-15

Client:

Rule Engineering LLC

Project:

San Juan 29-5 Unit 49A

MB-20182 Sample ID

SampType: MBLK

TestCode: EPA Method 300.0: Anions

LowLimit

Client ID:

PBS

Batch ID: 20182

PQL

RunNo: 27409

Prep Date:

Units: mg/Kg

Client ID:

Prep Date:

7/9/2015

Analysis Date: 7/9/2015

SeqNo: 822344

Analyte

Result

SPK value SPK Ref Val %REC HighLimit

%RPD **RPDLimit** Qual

Chloride

ND 1.5

Sample ID LCS-20182

LCSS

7/9/2015

SampType: LCS

TestCode: EPA Method 300.0: Anions

RunNo: 27409

SegNo: 822345

Units: mg/Kg

Analysis Date: 7/9/2015

Batch ID: 20182

HighLimit

%RPD **RPDLimit**

Qual

Result

PQL SPK value SPK Ref Val

15.00

%REC 94.9

Analyte Chloride

14

1.5

110

Qualifiers:

Value exceeds Maximum Contaminant Level.

Spike Recovery outside accepted recovery limits

E Value above quantitation range

Analyte detected below quantitation limits I

RSD is greater than RSDlimit 0

RPD outside accepted recovery limits

Analyte detected in the associated Method Blank

ND Not Detected at the Reporting Limit

Sample pH Not In Range P

Reporting Detection Limit

Η Holding times for preparation or analysis exceeded

Page 2 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1507083

14-Jul-15

Qual

Qual

Client:

Rule Engineering LLC

Project:

San Juan 29-5 Unit 49A

Sample ID MB-20077

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID:

Batch ID: 20077

PQL

RunNo: 27259

Prep Date: 7/2/2015

Analysis Date: 7/2/2015

SeqNo: 816808

Units: mg/Kg

HighLimit

Analyte

Client ID:

Analyte

SPK value SPK Ref Val %REC LowLimit

Result

ND 20

SampType: LCS

Batch ID: 20077

PQL

20

TestCode: EPA Method 418.1: TPH

RunNo: 27259

Prep Date: 7/2/2015

Petroleum Hydrocarbons, TR

Sample ID LCS-20077

LCSS

Analysis Date: 7/2/2015

Result

100

SeqNo: 816809

%REC

Units: mg/Kg HighLimit

126

%RPD

%RPD **RPDLimit** Qual

RPDLimit

Petroleum Hydrocarbons, TR

Sample ID LCSD-20077

SampType: LCSD

TestCode: EPA Method 418.1: TPH

RunNo: 27259

99.6

86.7

Client ID: LCSS02 Prep Date: 7/2/2015

Batch ID: 20077 Analysis Date: 7/2/2015

PQL

20

SeqNo: 816810

Units: mg/Kg

%RPD HighLimit

Analyte Petroleum Hydrocarbons, TR

SPK value SPK Ref Val 100.0

SPK value SPK Ref Val

100.0

%REC

86.7

LowLimit

2.73

RPDLimit

20

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range E
- Analyte detected below quantitation limits
- RSD is greater than RSDlimit 0
- R RPD outside accepted recovery limits
- Spike Recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- Sample pH Not In Range P
- Reporting Detection Limit

Page 3 of 4

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1507083

14-Jul-15

Client:

Rule Engineering LLC

Project:

San Juan 29-5 Unit 49A

Sample ID MB-20074	Samp ⁻	SampType: MBLK			TestCode: EPA Method 8021B: Volatiles					
Client ID: PBS	Batc	Batch ID: 20074			RunNo: 27293					
Prep Date: 7/2/2015	Analysis Date: 7/6/2015			S	SeqNo: 818262 Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.90		1.000		89.6	80	120			
Sample ID LCS-20074	SampType: LCS			TestCode: EPA Method 8021B: Volatiles				tiles		
Client ID: LCSS	Batc	h ID: 20	074	F	RunNo: 2	7293				
D D-1 7/0/0045	A -	A I ' D - I E IN ION I				10000	LI-h- no			

Sample ID LC3-20074	Samp Type. LC3			163	icode. Ei						
Client ID: LCSS	Batch ID: 20074			F							
Prep Date: 7/2/2015	Analysis D	ate: 7/	6/2015	S	SeqNo: 818263		Units: mg/k	(g			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	1.0	0.050	1.000	0	102	76.6	128				
Toluene	0.97	0.050	1.000	0	97.0	75	124				
Ethylbenzene	1.0	0.050	1.000	0	101	79.5	126				
Xylenes, Total	3.1	0.10	3.000	0	102	78.8	124				
Surr: 4-Bromofluorobenzene	0.95		1.000		94.7	80	120				

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 4 of 4



Hall Environmental Analysis Laboratory

4901 Hawkins NE Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

RULE ENGINEERING LL Work Order Number: 1507083 RcptNo: 1 Client Name: Received by/date: Logged By: Ashley Gallegos 7/1/2015 7:15:00 AM 7/2/2015 7:31:16 AM Completed By: **Ashley Gallegos** Reviewed By: Chain of Custody Yes [] Not Present 1 Custody seals intact on sample bottles? No [2. Is Chain of Custody complete? Yes 🖈 Not Present 3. How was the sample delivered? Courier Log In No [] NA L 4. Was an attempt made to cool the samples? NA [] 5. Were all samples received at a temperature of >0° C to 6.0°C No ... 6. Sample(s) in proper container(s)? No L 7. Sufficient sample volume for indicated test(s)? No . No L 8. Are samples (except VOA and ONG) properly preserved? NA [No 🖈 9. Was preservative added to bottles? No VOA Vials 10. VOA vials have zero headspace? No | Yes No 🖈 11. Were any sample containers received broken? # of preserved bottles checked No [for pH: 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No 13. Are matrices correctly identified on Chain of Custody? 14. Is it clear what analyses were requested? 15. Were all holding times able to be met? No . Checked by: (If no, notify customer for authorization.) Special Handling (if applicable) 16. Was client notified of all discrepancies with this order? Yes No NA 🖈 Person Notified: Date By Whom: Via: eMail Phone Fax In Person Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp °C Condition Seal Intact | Seal No Seal Date Signed By 1.3 Good Yes

Chain-of-Custody Record lient: Rule Engineering LLC lailing Address: 501 Arrport Drive Lite 205, Farmington NM 87401			Turn-Around Time:				HALL ENVIRONMENTAL ANALYSIS LABORATORY														
																		Project Name: San Juan 29-5 Unit 49A Project #:			
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mail or Fax#:			Project Manager:				(y	0					(7)								
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Standard) H	DR			S		7.5 P. P.	8082							
ccreditation NELAP Other			Sampler: DW / CB On Ice: Ø Yes □ No				TP	70	8.1	4.1	3270		Ž	/ 80		2	Chlorides			Ê	
			Sample Temperature: /. <				1 Ш	GR	4	20	or 8	05	ON N	es	_	O	ora			70	
EDD (Type)			Cample remperature. 7, 5				ITB	38 (hod	hoc	310	Met	0	ticic	OA	ni-	74			es (
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 150 7083	BTEX + WITH	BTEX + MTBE	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,SO4)	8081 Pesticides /	8260B (VOA)	8270 (Semi-VOA)	30.06			Air Bubbles (Y or N)
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6/5 1837 MALTINGELOUS				Received by: Date Time Remarks: But to ConocoPhillips																	
113	f recessary.	samples sub-	mitted to Hall Environmental may be subo	contracted to other a	ccrecited laboratorie	es. This serves as notice of thi	s possi	bility. /	Any su	b-contr	racted	data	will be	e clear	ly nota	ated or	the a	nalytic	al repor	t.	

