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

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

Form C-144 Revised June 6, 2013

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

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

Pit, Below-Grade Tank, or	
13630 Proposed Alternative Method Permit or Closure Plan Application	<u>on</u>
Type of action: Below grade tank registration	OIL CONS. DIV DIST. 3
☐ 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	NOV 2 3 2015
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 alterna	
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface we environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's	
1.	
Operator: BP America Production Company OGRID #: 778	
Address: 200 Energy Court, Farmington, NM 87401	
Facility or well name: Johnson 001	
API Number: 3004509862 OCD Permit Number:	
U/L or Qtr/Qtr J Section 2 Township 30N Range 11W County: San Juan	
Center of Proposed Design: Latitude 36.837942 Longitude -107.956297 NAI	): □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:	
3. Selow-grade tank: Subsection I of 19.15.17.11 NMAC	
Volume: 21.0 bbl Type of fluid: Produced water	
Tank Construction material: Steel	
Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	7.
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other Single walled/double bottomed; side walls vi	SIDIE
Liner type: Thicknessmil	
4. Alternative Method:	
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for	consideration of approval
Dubilitial of all exception request is required. Exceptions must be submitted to the Santa re Ellyholmichtal Dureau office for	consideration of approval.

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, institution or church)  Four foot height, four strands of barbed wire evenly spaced between one and four feet  Alternate. Please specify	hospital,
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)  Screen Netting Other  Monthly inspections (If netting or screening is not physically feasible)	
Signs: Subsection C of 19.15.17.11 NMAC  12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  Signed in compliance with 19.15.16.8 NMAC	
Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  Please check a box if one or more of the following is requested, if not leave blank:  Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
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  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  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 ☐ NA ☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ No ☐ Yes ☐ No ☐ N
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  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  Below Grade Tanks	Yes No
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	Yes No
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	
- Visual hispection (certification) of the proposed site, Aerial photo, Saletite 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 300 feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).	
- Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa	
lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of	
initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the 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	NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  A List of wells with approved application for permit to drill associated with the pit.  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC  Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

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 attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC	documents are					
Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan  Emergency Response Plan  Oil Field Waste Stream Characterization  Monitoring and Inspection Plan  Erosion Control Plan  Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC						
Proposed Closure: 19.15.17.13 NMAC						
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 Falternative  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					
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC						
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					
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					
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						
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image						
Within 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						
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No					

<ul> <li>adopted pursuant to NMSA 1978, Section 3-27-3, as amended.</li> <li>Written confirmation or verification from the municipality; Written approval obtained from the municipality</li> </ul>	
	☐ 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.  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
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 beli	ef.
Name (Print):	
Signature: Date:	
e-mail address:	
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	
OCD Representative Signature: Approval Date: 1210  Title: Tow; connected Docalet OCD Permit Number:	719015
OCD Representative Signature: Approval Date: 120	the closure report.
OCD Representative Signature:  OCD Permit Number:  OCD Permit Number:  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.	the closure report. complete this

perator Closure Certification:	
	h this closure report is true, accurate and complete to the best of my knowledge and
lief. I also certify that the closure complies with all applicable closure	osure requirements and conditions specified in the approved closure plan.
me (Print): Steve Moskal	Title: Field Environmental Coordinator
	Date: October 12, 2015 (SW)
gnature: Harry	Date: October 12, 2015
gnature.	Date. October 12, 2013

## BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### BELOW-GRADE TANK CLOSURE PLAN

## Johnson 001 <u>API No. 3004509862</u> Unit Letter J, Section 2, T30N, R11W

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.
  - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
  - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 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 21 bbl BGT	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	< 0.040
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.080
TPH	US EPA Method SW-846 418.1	100	<48
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<30

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

Soil under the BGT was sampled for laboratory analysis of TPH, BTEX and chloride with results below the stated limits.

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.

Laboratory results indicate no significant release has 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 the well is scheduled for plugging and abandonment.

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 under the BGT was backfilled with clean soil and the well is scheduled for plugging and abandonment.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area under the BGT was backfilled with clean soil and the well is scheduled for plugging and abandonment. 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.

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

## State of New Mexico Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011
ubmit 1 Copy to appropriate District Office in

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	orrective A	ction	1			
						OPERA'	ГOR		☐ Initia	al Report	$\boxtimes$	Final Report
Name of Co	ompany: B	P				Contact: Ste	eve Moskal					
Address: 20	00 Energy	Court, Farmi	ngton, N	M 87401		Telephone 1	No.: 505-326-94	197				April 1
Facility Na	me: Johnso	on 001				Facility Typ	e: Natural gas v	well				
Surface Ow	ner: Feder	al		Mineral (	)wner:	Federal			API No	. 30045098	362	
				LOCA	ATIO	N OF RE	LEASE					
Unit Letter J	Section 2	Township 30N	Range 11W	Feet from the 1,650	North South	/South Line	Feet from the 1,550	East/V East	West Line	County: Sa	an Juan	
		Latitu	ide 36.	837942		Longitude	-107.956297					
				NAT	URE	OF REL	EASE					
Type of Rele	ease: N/A					Volume of	Release: none		Volume	Recovered:	none	
Source of Re						Date and I	Iour of Occurrence	e: N/A	Date and	Hour of Di	scovery	y: N/A
Was Immedi	ate Notice (		Yes [	No Not R	equired	If YES, To	Whom?					
By Whom?  Date and Hour:												
Was a Water	course Read	ched?	-				olume Impacting t	the Wate	ercourse.			
			Yes 🛛	No								
Describe Cat	use of Probleval of a belo	em and Remedow grade tank	dial Action (21 bbl),	n Taken. soil was sampled	with no	significant in	npacts noted.	-				
During remo impacts. The and abandon I hereby cert	val of a beloe location of ment.	ow grade tank, f the BGT has	, soil was s been back ven above	sampled to ensure	s in the	existing well the best of my	curred. The attach pad area. Reclam knowledge and u	nation o	f the well w	uant to NMO	DCD ru	r plugging iles and
should their or the enviro	operations h nment. In a	ave failed to a	dequately CD accep	investigate and r	emedia	te contaminati	arked as "Final Ro on that pose a thre e the operator of r	eat to gr	round water	, surface wa	ter, hun	nan health
Signature:	les	un				A	OIL CON		1	DIVISIO	N	
Printed Nam	e: Steve Mo	skal				Approved by	Environmental S	pecialis		esse.	C	5
Title: Field F	Environment	al Coordinato	r			Approval Da	e: 12109 IS	5	Expiration l	Date:		
		moskal@bp.cc				Conditions of	Approval:			Attached		
Date: Octob	er 12, 2015	3,2015 (81	Phone	: 505-326-9497								

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

CLIENT: BP	P.O. BOX 87, BL	IGINEERING, INC. .OOMFIELD, NM 87413 5) 632-1199	3	API #: 3004509  TANK ID (if applicble): A	4141
FIELD REPORT:	(circle one): BGT CONFIRMATION /	RELEASE INVESTIGATION / OTHER:		PAGE #:1 o	f _1
	30N RNG: 11W PM:	NM CNTY: SJ ST: I	<b>MM</b> AN	DATE STARTED: 08/0 DATE FINISHED: ENVIRONMENTAL	06/15
LEASE #:	PROD. FORMATION: PC COM	STRIKE NTRACTOR: MBF - C. PARKS			JV
1) 21 BGT (SW/DB) 2)	GPS COORD.: 36.83	DIS	TANCE/BEAF TANCE/BEAF	RING FROM W.H.:	311E
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR	LAB USED: HALL	A POWER PORT TO BE STATE		OVM READING (ppm)
1) SAMPLE ID:	SAMPLE DATE:SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS: _			NA
SOIL COLOR: DARK YELLOW COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST MOIST / W SAMPLE TYPE: GRAB COMPOSITE + DISCOLORATION/STAINING OBSERVED: YES	Y COHESIVE / COHESIVE / HIGHLY COHESIVE DOSE FIRM DENSE / VERY DENSE HET / SATURATED / SOF PTS5	PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLOENSITY (COHESIVE CLAYS & SILTS): SOFT IC ODOR DETECTED: YES NO EXPLANATION NAVAREAS DISPLAYING WETNESS: YES NO	/FIRM/S	STIFF / VERY STIFF / HARD	LY PLASTIC
SITE OBSERVATION  APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA:  OTHER: GAS WELL TO BE PLUGGED &	D AND/OR OCCURRED: YES NO EXPLAN YES NO EXPLANATION -				
SOIL IMPACT DIMENSION ESTIMATION: DEPTH TO GROUNDWATER: >100' N	NA ft. X NA  EAREST WATER SOURCE: >1,000'	ft. X NA ft. EXCAVATI  NEAREST SURFACE WATER: <1,000'		IMATION (Cubic Yards) :	NA 00 ppm
SITE SKETCH  TO METER RUN	BGT Located : off on site	PLOT PLAN circle: attached No.	W RE Pr P. Pe OC Tanil ID A	CALIB. READ. = NA ppn CALIB. GAS = NA ppn NA am/pm DATE:  MISCELL. NOT O: EF #: P-225 C: ZDCS01DRL1 #: rmit date(s): 06/14/ CD Appr. date(s): 08/03/ COVM = Organic Vapor Met ppm = parts per million BGT Sidewalls Visible: Y / N BGT Sidewalls Visible: Y / N	NA RF = 0.52 NA TES
	OW-GRADE TANK LOCATION; SPD = SAMPLE POII E WALL; DW - DOUBLE WALL; SB - SINGLE BOTTO	DW; T.H. = TEST HOLE; ~= APPROX.; W.H. = WELL HEA NT DESIGNATION; R.W. = RETAINING WALL; NA - NOT	D; Ma	BGT Sidewalls Visible: Y / Nagnetic declination: 10	^



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

OrderNo.: 1508275

October 12, 2015

Nelson Velez

Blagg Engineering

P. O. Box 87

Bloomfield, NM 87413

TEL: (505) 320-3489

FAX (505) 632-3903

RE: Johnson #1

#### Dear Nelson Velez:

Hall Environmental Analysis Laboratory received 1 sample(s) on 8/7/2015 for the analyses presented in the following report.

This report is a revised report and it replaces the original report issued August 11, 2015.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> or the state specific web sites. 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. All samples are reported as received unless otherwise indicated.

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

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

## **Analytical Report**

Lab Order 1508275

Date Reported: 10/12/2015

## Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** Blagg Engineering

Client Sample ID: 5PC-TB@7' (21)

Project: Johnson #1

Collection Date: 8/6/2015 9:20:00 AM

Lab ID: 1508275-001

Matrix: MEOH (SOIL) Received Date: 8/7/2015 8:00:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS					Analyst:	LGT
Chloride	ND	30	mg/Kg	20	8/7/2015 12:03:02 PM	20668
EPA METHOD 8015M/D: DIESEL RAN	GE ORGANIC	S			Analyst:	KJH
Diesel Range Organics (DRO)	ND	9.5	mg/Kg	1	8/7/2015 11:15:23 AM	20664
Motor Oil Range Organics (MRO)	ND	48	mg/Kg	1	8/7/2015 11:15:23 AM	20664
Surr: DNOP	83.8	57.9-140	%REC	1	8/7/2015 11:15:23 AM	20664
EPA METHOD 8015D: GASOLINE RAI	NGE				Analyst:	RAA
Gasoline Range Organics (GRO)	ND	4.0	mg/Kg	1	8/7/2015 10:54:06 AM	20637
Surr: BFB	86.7	75.4-113	%REC	1	8/7/2015 10:54:06 AM	20637
EPA METHOD 8021B: VOLATILES					Analyst:	RAA
Benzene	ND	0.040	mg/Kg	1	8/7/2015 10:54:06 AM	20637
Toluene	ND	0.040	mg/Kg	1	8/7/2015 10:54:06 AM	20637
Ethylbenzene	ND	0.040	mg/Kg	1	8/7/2015 10:54:06 AM	20637
Xylenes, Total	ND	0.080	mg/Kg	1	8/7/2015 10:54:06 AM	20637
Surr: 4-Bromofluorobenzene	92.5	80-120	%REC	1	8/7/2015 10:54:06 AM	20637

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

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits Page 1 of 5
- P Sample pH Not In Range
- RL Reporting Detection Limit

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1508275

12-Oct-15

Client:

Blagg Engineering

Project:

Johnson #1

Sample ID MB-20668

SampType: MBLK

TestCode: EPA Method 300.0: Anions

PBS

Batch ID: 20668

RunNo: 28069

Client ID:

Prep Date: 8/7/2015

Sample ID LCS-20668

LCSS

Analysis Date: 8/7/2015

SeqNo: 845462

Units: mg/Kg

HighLimit

Analyte

SPK value SPK Ref Val %REC LowLimit

**RPDLimit** 

Qual

1.5

Chloride

ND

SampType: LCS Batch ID: 20668

RunNo: 28069

TestCode: EPA Method 300.0: Anions

Client ID: Prep Date:

8/7/2015

Analysis Date: 8/7/2015

SeqNo: 845463

Units: mg/Kg

Analyte

15.00

90

HighLimit

**RPDLimit** 

Qual

PQL

SPK value SPK Ref Val %REC

100

Chloride

15

%RPD

1.5

LowLimit

110

D

ND

Qualifiers: Value exceeds Maximum Contaminant Level.

% Recovery outside of range due to dilution or matrix

Sample Diluted Due to Matrix Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit R RPD outside accepted recovery limits B Analyte detected in the associated Method Blank

E Value above quantitation range

Reporting Detection Limit

P Sample pH Not In Range

RL

Analyte detected below quantitation limits Page 2 of 5

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1508275 12-Oct-15

Client:

Blagg Engineering

Project:

Johnson #1

Sample ID MB-20664	Samp	Type: ME	BLK	Tes	TestCode: EPA Method 8015M/D: Diesel Range Organics						
Client ID: PBS	Batc	h ID: 20	664	F	RunNo: 28026						
Prep Date: 8/7/2015	Analysis [	Analysis Date: 8/7/2015			SeqNo: 843785			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Diesel Range Organics (DRO)	ND	10									
Motor Oil Range Organics (MRO)	ND	50									
Surr: DNOP	9.8		10.00		98.5	57.9	140				
Sample ID LCS-20664	Samp	Type: LC	s	Tes	tCode: E	PA Method	8015M/D: Di	esel Rang	e Organics		
Client ID: LCSS	Batch	h ID: 20	664	RunNo: 28026							
Prep Date: 8/7/2015	Analysis E	Date: 8/	7/2015	SeqNo: 843786			Units: mg/k				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Diesel Range Organics (DRO)	48	10	50.00	0	96.4	57.4	139				
Surr: DNOP	4.8		5.000		95.7	57.9	140				

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits

Page 3 of 5

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

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1508275

12-Oct-15

Client:

Blagg Engineering

Project:

Johnson #1

Sample ID LCS-20637				TestCode: EPA Method 8015D: Gasoline Range RunNo: 28035						
Client ID: LCSS										
Prep Date: 8/6/2015				SeqNo: 844373			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	<b>RPDLimit</b>	Qual
Gasoline Range Organics (GRO)	21	5.0	25.00	0	84.9	79.6	122			
Surr: BFB	920		1000		92.2	75.4	113			

Sample ID MB-20637	SampType: MBLK			TestCode: EPA Method 8015D: Gasoline Range										
Client ID: PBS	Batcl	n ID: 20	637	R										
Prep Date: 8/6/2015	Analysis Date: 8/7/2015			S	SeqNo: 8	44374	Units: mg/k							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Gasoline Range Organics (GRO)	ND	5.0												
Surr: BFB	880		1000		87.8	75.4	113							

#### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

Page 4 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1508275

12-Oct-15

Client:

Blagg Engineering

Project:

Johnson #1

		Гуре: LC										
Sample ID LCS-20637	Tes	TestCode: EPA Method 8021B: Volatiles										
Client ID: LCSS	Batc	h ID: 20	637	F								
Prep Date: 8/6/2015	Analysis Date: 8/7/2015			5	SeqNo: 844420 Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	0.94	0.050	1.000	0	94.4	76.6	128					
Toluene	0.94	0.050	1.000	0	93.5	75	124					
Ethylbenzene	0.90	0.050	1.000	0	90.5	79.5	126					
Kylenes, Total	2.9	0.10	3.000	0	98.1	78.8	124					
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120					
Sample ID MB-20637	Samp	Гуре: МЕ	BLK	Tes	tCode: El	PA Method	8021B: Vola	tiles	W 1 1			
Client ID: PBS	Batc	Batch ID: 20637			RunNo: 28035							
Prep Date: 8/6/2015	Analysis [	Date: 8/	7/2015	SeqNo: 844423			Units: mg/k	(g				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	ND	0.050							+ Tu -			
Toluene	ND	0.050										
Ethylbenzene	ND	0.050										
Kylenes, Total	ND	0.10										
Surr: 4-Bromofluorobenzene	0.97		1.000		96.6	80	120					

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits

Page 5 of 5

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



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

RcptNo: 1 BLAGG Work Order Number: 1508275 Client Name: 78 Received by/date: Ashley Gall 8/7/2015 8:00:00 AM Logged By 8/7/2015 8:48:38 AM Completed By: **Ashley Gallegos** 08/07/15 ns Reviewed By: Chain of Custody No [ Not Present Yes 1. Custody seals intact on sample bottles? No 🗌 Not Present Yes V 2. Is Chain of Custody complete? 3. How was the sample delivered? Courier Log In Yes V No L NA C 4. Was an attempt made to cool the samples? NA 🗌 Yes V No 🗌 5. Were all samples received at a temperature of >0° C to 6.0°C Yes V No 🗌 Sample(s) in proper container(s)? No 🗌 7. Sufficient sample volume for indicated test(s)? No 🗌 Yes V 8. Are samples (except VOA and ONG) properly preserved? NA Yes 🗌 No V 9. Was preservative added to bottles? No 🗌 No VOA Vials Yes 10. VOA vials have zero headspace? Yes -No V 11. Were any sample containers received broken? # of preserved bottles checked for pH: No 🗌 Yes V 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? Yes V No L 13 Are matrices correctly identified on Chain of Custody? No 🗌 Yes V 14. Is it clear what analyses were requested? Checked by: Yes V No 🗌 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) NA V Yes No 🗌 16. Was client notified of all discrepancies with this order? Date Person Notified: eMail Phone Fax In Person By Whom: Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp C Condition Seal Intact Seal No Seal Date Signed By Good Yes

Chain-of-Custody Record  Client: BLAGG ENGR. / BP AMERICA  Mailing Address: P.O. BOX 87  BLOOMFIELD, NM 87413  Phone #: (505) 632-1199  email or Fax#:  QA/QC Package:  Standard			Turn-Around Time:  SAME  ANDAY  Project Name:  TOHASON #				HALL ENVIRONMENTAL ANALYSIS LABORATORY  www.hallenvironmental.com  4901 Hawkins NE - Albuquerque, NM 87109  Tel. 505-345-3975 Fax 505-345-4107  Analysis Request														
			Project Manager:  NELSON VELEZ  Sampler: NELSON VELEZ  On Ice: A Yes   No  Sample Temperature: 27			E + TMB4s (8021B)	+	TPH 80158 (GRO / DRO / MRO)	od 418.1)	(Method 504.1)	PAH (8310 or 8270SIMS)		Anions (F,Cl,NO <sub>3</sub> ,NO <sub>2</sub> ,PO <sub>4</sub> ,SO <sub>4</sub> )	8081 Pesticides / 8082 PCB's			-300.0 / water - 300.1)		osite cample	Coluc Sample	
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX +-MTBE	STEX + MTB	<b>IPH 80158</b>	TPH (Method 418.1)	EDB (Meth	PAH (8310	RCRA 8 Metals	Anions (F,0	8081 Pesti	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil	Training the s	Grab sample	pt. comp
8/6/15	0920	SOIL	59GTBC7'(21)	4021	Cool	-001	×		X			N S			N.			Х		>	( )
																			+		+
8 y 4 l																			+	+	+
Date: 8/6/15 Date: 8/6/15	Time:	Relinquish	7/1	Received by:  Chusti Received by:  Amga	u Walter	Date Time 8/6/15 /009  Date Time 08/07/16 0800	BI Je	ff Pe	RECT ace,	200 1	O BF	gy Co						7401	310	) RL	1



