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.

16473

# Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action:
- ☐ Below grade tank registration
- ☐ Permit of a pit or proposed alternative method
- ☐ Closure of a pit, below-grade tank, or proposed alternative method
- ☐ Modification to an existing permit/or registration
- ☒ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

***Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request***

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Roddy Production Co. OGRID #: 36845
Address: PO Box 2221 Farmington NM 87499-2221
Facility or well name: Chacon Jicarilla Apache D #4
API Number: 30-039-21258 OCD Permit Number:
U/L or Qtr/Qtr P Section 9 Township 23N Range 3W County: Rio Arriba
Center of Proposed Design: Latitude 36.233781 Longitude -107.156220 NAD: ☐ 1927 ☐ 1983
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment

2.
☐ **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

* Insufficient GW Data
Submit modification OR Close at most Stringent STANDARD

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 60 bbl Type of fluid: Produced Water
Tank Construction material: Fiberglass
☐ 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 mil ☐ HDPE ☐ PVC ☐ Other

NMOCD
OCT 03 2018
DISTRICT III

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 4' Hog wire fence



16

## Smith, Cory, EMNRD

**From:** Smith, Cory, EMNRD
**Sent:** Friday, October 5, 2018 3:57 PM
**To:** Jeremy Divine (jdivine@crownquest.com)
**Cc:** Fields, Vanessa, EMNRD
**Subject:** Roddy BGT Chacon Jicarilla Apache D #3,7,10 and 11

Jeremy,

OCD has approved the closure Plan for the Chacon Jicarilla Apache D #3,7,10 and 11 with the following conditions of approval

- Roddy will close the BGT to the most stringent standard GW ≤ 50'

Roddy registration pack did not include conclusive Ground water information, Roddy can submit additional ground water information if warranted.

Thanks,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

6.

**Netting:** Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19.15.16.8 NMAC

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 acceptable source material are provided below.*** **Siting criteria does not apply to drying pads or above-grade tanks.**

| | |
|---|---|
| **General siting** | |
| **Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**<br>- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| **Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**<br>NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ 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)**<br>- 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)**<br>- 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)**<br>- 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)**<br>- 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).<br>- 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;.<br>- 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.)<br>- Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.<br>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |

| | |
|---|---|
| Within 100 feet of a wetland.<br>- 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).<br>- 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.<br>- 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;<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 300 feet of a wetland.<br>- 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).<br>- 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.<br>- 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.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |

10.

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

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

☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

11.

**Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are 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 19.15.17.9 NMAC 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: _____

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including $H_2S$, 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

13.

**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 Fluid 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

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- ☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

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

***Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.***

| | |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ 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).<br>- 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.<br>- 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.<br>- 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.<br>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.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- 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.<br>- FEMA map | ☐ Yes ☐ No |

16.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

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 belief.

Name (Print): Jeremy Divine Title: Foreman

Signature: Jeremy Divine Date: 10/2/2018

e-mail address: jdivine@crownquest.com Telephone: 432 557 6778

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** _____ **Approval Date:** _____

**Title:** _____ **OCD Permit Number:** _____

19.

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

***Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.***

☐ **Closure Completion Date:** _____

20.

**Closure Method:**

☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)

☐ If different from approved plan, please explain.

21.

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

- ☐ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☐ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☐ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique
- ☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

**Operator Closure Certification:**

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

**Closure and Reclamation Plan**
**Roddy Production Co., Inc.**
**Chacon Jicarilla Apache D#4 Production Single Wall BGT**
**API 30-039-21258, S-09, T23N, R3W, Contract #412**

In Accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below grade tanks on Roddy Production Co. locations in the San Juan Basin of New Mexico. This is Roddy Production's standard closure plan for all BGT's under Rule 19.15.17 NMAC and operated by Roddy Production Co. For closures that do not conform to this standard closure plan, a separate BGT specific closure plan will be developed and utilized.

**Closure Conditions and Timing for BGT:**

- Within 60 days of cessation of operation Roddy Production will:
  - Remove all Liquids/ sludge and dispose of in a division approved manner
- Within 72 hrs or 1 week prior to closure Roddy Production will:
  - Give notice to surface owners by certified mail. For public entities by email as specified on variance page.
  - Give notice to District Division verbally and in writing/email
- Within 6 months of cessation of operation Roddy Production will:
  - Remove BGT and dispose, recycle, reuse or reclaim in a division approved manner
  - Remove unused onsite equipment associated with the BGT
- Within 60 Days of closure Roddy Production will:
  - Send the District Division a closure report per 19.15.17.13.F

**General Plan Requirements:**

1. Prior to initiating any BGT closure except in case of emergency, Roddy Production will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hrs or 1 week before closure and a copy of this notification will be included in the closure report. In case of emergency, the surface owner of record will be notified as soon as practical.

2. Notice of the closure will be given to the Aztec District office between 72 hrs and 1 week of the scheduled closure via email or phone. The notification of closure will include the following.

   a. Operators Name (Roddy Production)
   b. Well name and API number
   c. Location (USTR)

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of the following NMOCD approved facilities depending on the proximity to the BGT site: Agua Moss Pretty Lady SWD #1 (Permit#1034-A), Agua Moss Sunco SWD #1 (Permit# CL1-005) or Basin Disposal (Permit #-NM 01-005), T-n-T Environmental (permit# NM-01-0008)

4. Solids and sludge's will be shoveled or vacuumed out for disposal at Envirotech (Permit # -NM01-0011), or JFJ Land Farm/ Industrial Ecosystems Inc. (Permit # NM 01-0010B)

5. Roddy Production will obtain prior approval from NMOCD to dispose, recycle, reuse or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded and EPA cleaned without soils or contaminated material for disposal as solid waste. Fiberglass and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426

6. Any Equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from location.

7. Following the removal of the tank and any liner material, Roddy Production will test the soils beneath the BGT as follows: If depth to groundwater cannot be identified the most stringent standard will be followed.

**TABLE I**

**Closure criteria for soils beneath Below Grade Tanks, Drying pads associated with Closed Loop systems and pits where contents are removed**

| Depth below bottom of pit to groundwater less than 10,000 mg/L TDS | Constituent | Method* | Limit** |
|---|---|---|---|
| ≤ 50 feet OCD | Chloride | EPA 300.0 | 600 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 100 mg/kg |
| | BTEX | EPA SW-846 Method 801B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |
| 51 feet-100 feet | Chloride | EPA 300.0 | 10,000 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 2,500 mg/kg |
| | GRO+DRO | EPA SW-846 Method 8015M | 1,000 mg/kg |
| | BTEX | EPA SW-846 Method 801B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |
| > 100 feet | Chloride | EPA 300.0 | 20,000 mg/kg |
| | TPH | EPA SW-846 Method 418.1 | 2,500 mg/kg |
| | GRO+DRO | EPA SW-846 Method 8015M | 1,000 mg/kg |
| | BTEX | EPA SW-846 Method 801B or 8260B | 50 mg/kg |
| | Benzene | EPA SW-846 Method 8021B or 8015M | 10 mg/kg |

* Or test method approved by the division

** Numerical limits or natural background, whichever is greater

a) At a minimum, a five point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.

b) The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13

(1) Or other test methods approved by the Division

(2) Numerical limits or natural background level, whichever is greater

(19.15.17.13 MAC-Ro, 19.15.17.13 NMAC 3/28/2013)

8. If the Division and/or Roddy Production determine there is a release, Roddy Production will comply with 19.15.17.13.C.3b
9. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and prevent ponding.

For those portions of the former BGT area that are no longer required for production activities, Roddy Production will seed the disturbed areas the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division approved methods. Roddy Production will notify the Division when reclamation or re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

a. Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
b. Total percentage plant cover of at least 70% of pre disturbance levels (excluding noxious weeds)
OR
c. Pursuant to 19.15.17.13.H.5d Roddy Production will comply with obligations imposed by other applicable federal or tribal agencies in which their re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

10. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

**Closure Report:**
All closure activities will include proper documentation and will be submitted to the NMOCD within 60 days of the BGT closure on a Closure Report Using Division Form C-144. The report will include the following:

- Proof of Closure Notice (Surface Owner & NMOCD)
- Backfilling and cover installation
- Confirmation sampling analytical results
- Disposal Facility Name(s) and permit number(s)
- Application Rate & seeding techniques
- Photo documentation of reclamation

CROWNQUEST

CROWNQUEST OPERATING, LLC

October 2, 2018

Attn: BIA Jicarilla Agency

P.O. Box 167

Dulce, NM 87528

RE: Chacon Jicarilla Apache D#4 BGT Closure

To whom it may concern,

This is Roddy Productions notification of our intent to close the Below Grade Tank on the Chacon Jicarilla Apache D#4 API# 30-039-21258, S-9, T23N, R3W, contract #412 Included is the closure and reclamation plan. If approved we plan to start closing Wednesday Oct. 10th , 2018. All activities will be coordinated with the Jicarilla Apache Nation, BLM and NMOCD. Please contact me if you have any questions or concerns.

Sincerely,

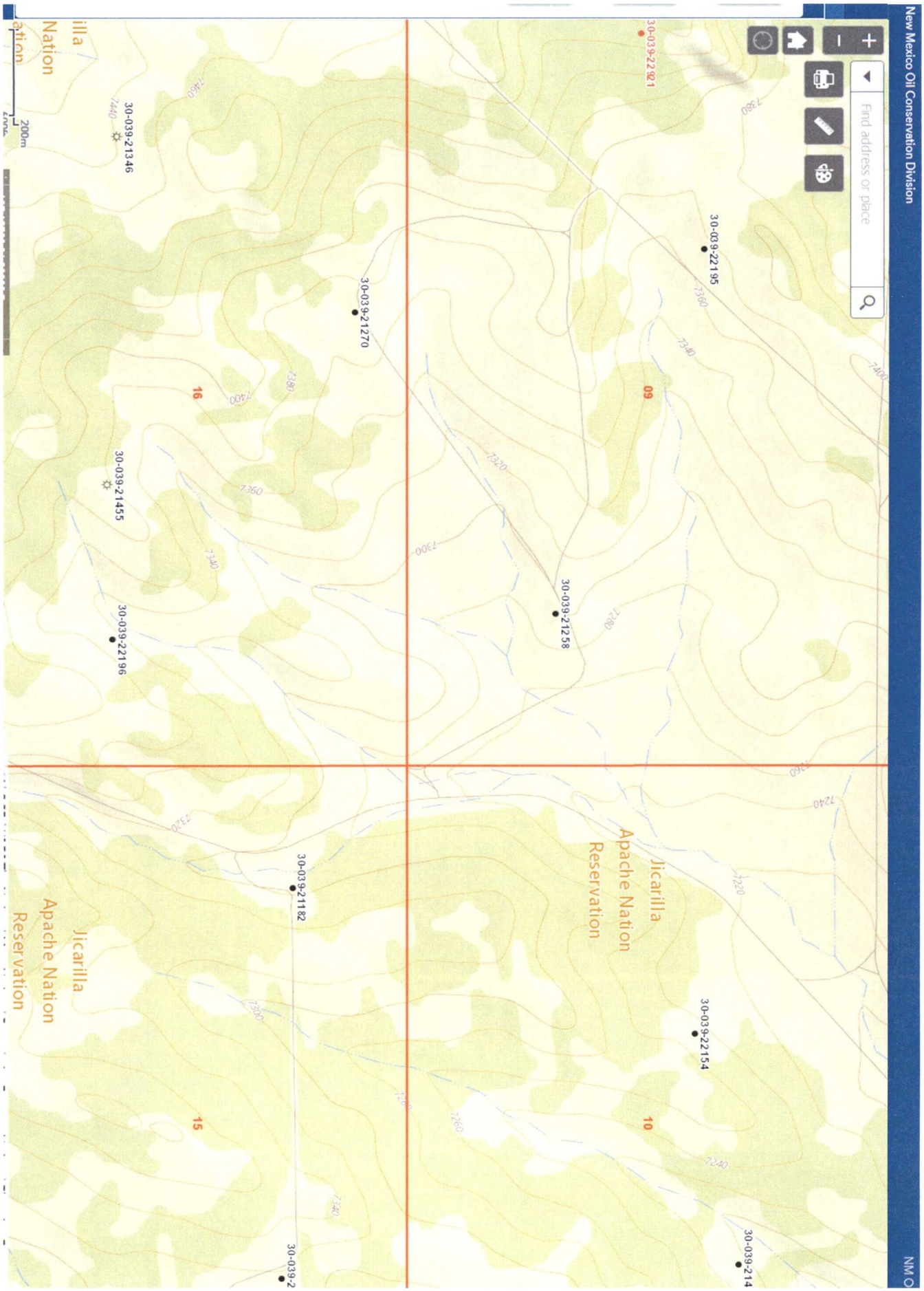
Jeremy Divine

Roddy Production/CrownQuest Operating

432 557 6778

jdivine@crownquest.com

Chacon Jicarilla Apache D#4, API 30-039-21258, Distance to water course 260’



# New Mexico Office of the State Engineer
# Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest) (NAD83 UTM in meters) (In feet)

| POD Number | POD Sub-basin Code | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Depth Well | Depth Water | Water Column |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SJ 00403 | SJ | SA | 3 | 2 | 2 | 15 | 23N | 03W | 307811 | 4011399* | 1403 | | |

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: --

**Record Count:** 1

**Basin/County Search:**

**Basin:** San Juan

**PLSS Search:**

**Section(s):** 09, 16, 15, 14 **Township:** 23N **Range:** 03W

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

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(NAD83 UTM in meters)

(In feet)

| POD Number | POD Sub-Code | basin | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Depth Well | Depth Water | Water Column |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SJ 01859 | | SJ | RA | | | 4 | 21 | 24N | 03W | 306247 | 4018537* | 324 | 200 | 124 |
| SJ 02130 | | SJ | RA | | 2 | 2 | 15 | 24N | 03W | 308117 | 4021115* | 273 | 100 | 173 |
| SJ 02172 | | SJ | RA | 4 | 4 | 2 | 12 | 24N | 03W | 311460 | 4022170* | 340 | 140 | 200 |
| SJ 02217 | | SJ | RA | 2 | 2 | 2 | 05 | 24N | 03W | 305069 | 4024489* | 550 | 120 | 430 |
| SJ 02515 | | SJ | RA | 3 | 4 | 4 | 03 | 24N | 03W | 308060 | 4023025* | 1000 | 650 | 350 |
| SJ 02515 DCL | O | | RA | 3 | 4 | 4 | 03 | 24N | 03W | 308060 | 4023025* | 1000 | 650 | 350 |
| SJ 02516 | | SJ | RA | 1 | 3 | 1 | 06 | 24N | 03W | 302693 | 4024121* | 1000 | 650 | 350 |
| SJ 02516 DCL | O | | RA | 1 | 3 | 1 | 06 | 24N | 03W | 302693 | 4024121* | 1000 | 650 | 350 |
| SJ 02952 | | SJ | RA | 2 | 2 | 1 | 26 | 24N | 03W | 308951 | 4017983* | 400 | | |
| SJ 02953 | | SJ | RA | 1 | 4 | 3 | 13 | 24N | 03W | 310404 | 4019967* | 70 | | |
| SJ 02954 | | SJ | RA | 4 | 2 | 4 | 35 | 24N | 03W | 309703 | 4015355* | 380 | | |
| SJ 02955 | | SJ | RA | 1 | 1 | 4 | 35 | 24N | 03W | 309101 | 4015562* | 350 | | |
| SJ 02956 | | SJ | RA | 2 | 2 | 1 | 26 | 24N | 03W | 308951 | 4017983* | 360 | | |
| SJ 02958 | | SJ | RA | 2 | 3 | 4 | 24 | 24N | 03W | 310971 | 4018350* | 168 | | |
| SJ 04218 POD1 | | SJ | RA | 4 | 2 | 2 | 03 | 24N | 03W | 308344 | 4024332 | 394 | 326 | 68 |
| SJ 04219 POD1 | | SJ | RA | | 2 | 1 | 09 | 24N | 03W | 305757 | 4022868 | 334 | 196 | 138 |

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

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(NAD83 UTM in meters)

(In feet)

| POD Number | POD Sub-basin Code | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Depth Well | Depth Water | Water Column |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SJ 00403 | SJ | SA | 3 | 2 | 2 | 15 | 23N | 03W | 307811 | 4011399* | 1403 | | |

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: --

**Record Count:** 1

**Basin/County Search:**

**Basin:** San Juan

**PLSS Search:**

**Section(s):** 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36

**Township:** 23N

**Range:** 03W

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

Minimum Depth: **100 feet**

Maximum Depth: **650 feet**

**Record Count:** 16

**Basin/County Search:**

**Basin:** San Juan

**PLSS Search:**

**Section(s):** 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36 **Township:** 24N **Range:** 03W