District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.

For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a submit to the santa Fe Environmental Bureau office and provide according to the submitted by the submitted by

provide a copy to the appropriate NMOCD District Office.

# Pit, Closed-Loop System, Below-Grade Tank, or

Proposed Alternative Method	Permit or Closure Plan Application
·· <u>—</u> · · · · · · · · · · · · · · · · · · ·	ystem, below-grade tank, or proposed alternative method system, below-grade tank, or proposed alternative method
	dividual pit, closed-loop system, below-grade tank or alternative request
	ibility should operations result in pollution of surface water, ground water or the ply with any other applicable governmental authority's rules, regulations or ordinances.
	OGRID #: 778
Address: 200 ENERGY COURT, FARMINGTON, NM 87410	
Facility or well name: BLANCO A 001M	OT ASSE STU
•	OCD Permit Number: DIST, 3
	ON Range O8W County: San Juan
Center of Proposed Design: Latitude 36.62045	Longitude 107.62801 NAD: ☐ 1927 🛛 1983
Surface Owner: X Federal X State Private Tribal Trust or Indian	
☑ Pit: Subsection F or G of 19.15.17.11 NMAC	Closed-loop System: Subsection H of 19.15.17.11 NMAC
— — Temporary: ☐ Drilling ☑ Workover	Drying Pad Tanks Haul-off Bins Other
Permanent Emergency Cavitation Steel Pit	☐ Lined ☐ Unlined
Lined □ Unlined	Liner type: Thicknessmil
Liner type: Thickness 20 mil LLDPE HDPE PVC	☐ Other
Other String-Reinforced	Seams:  Welded  Factory  Other
Seams: Welded  Factory Other	Volume:yd³
Volume: 900 bbl Dimensions: L 35 x W 35 x D 8	Dimensions: Length x Width
Below-grade tank: Subsection I of 19.15.17.11 NMAC	Fencing: Subsection D of 19.15.17.11 NMAC
Volume:bbl	☐ Chain link, six feet in height, two strands of barbed wire at top
Type of fluid:	Four foot height, four strands of barbed wire evenly spaced between one and
Tank Construction material:	four feet
Secondary containment with leak detection	Netting: Subsection E of 19.15.17.11 NMAC
☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	Screen Netting Other
☐ Visible sidewalls and liner	Monthly inspections
☐ Visible sidewalls only	Signs: Subsection C of 19.15.17.11 NMAC
Other	12'x24', 2' lettering, providing Operator's name, site location, and
Liner type: Thicknessmil  HDPE PVC	emergency telephone numbers
Other	☑ Signed in compliance with 19.15.3.103 NMAC
Alternative Method:	Administrative Approvals and Exceptions:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration	Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.
of approval.	Please check a box if one or more of the following is requested, if not leave
	blank:  Administrative approval(s): Requests must be submitted to the
•	appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval. (Fencing in Design Plan)
	consideration of approval. Trending in besign rian /

Form C-144

Oil Conservation Division

Page 1 of 4

Exception(s): Requests must be submitted to the Santa Fe

Environmental Bureau office for consideration of approval



Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.	
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes 🖾 No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - 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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ⊠ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  (Applies to permanent pits)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No 図 NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; 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 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ 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	☐ Yes ⊠ No
Within a 100-year floodplain. - FEMA map	☐ Yes ⊠ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Instructions: 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 19.15.17.1 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC ☐ Previously Approved Design (attach copy of design) API Number: or Permit Number: or Permit Number:	ouments are
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do	eumonts aro
attached.  Geologic and Hydrogeologic Data (required for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of Siting Criteria Compliance Demonstrations (required for on-site closure) - based upon the appropriate requirements of 19.15.17.10 Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	19.15.17.9
Previously Approved Design (attach copy of design) API Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC	
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the de attached.	ocuments are
Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC	
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Climatological Factors Assessment	
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC	
Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC	
Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC	
Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC	
☐ Quality Control/Quality Assurance Construction and Installation Plan ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC	
Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC	
Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan	
Emergency Response Plan	
Oil Field Waste Stream Characterization	
Monitoring and Inspection Plan	
Erosion Control Plan	
Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
Proposed Closure: 19.15.17.13 NMAC	
Type: Drilling Workover Emergency Cavitation Permanent Pit Below-grade Tank Closed-loop System	] Alternative
Proposed Closure Method: Waste Excavation and Removal	
Waste Removal (Closed-loop systems only)	
On-site Closure Method (Only for temporary pits and closed-loop systems)	
<ul> <li>✓ In-place Burial ☐ On-site Trench Burial</li> <li>☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for continuous processing to the Santa Fe Environmental Bureau for continuous process.</li> </ul>	nsideration)
	isideration)
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	1
source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from	1
the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau	
office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10	I
NMAC for guidance.	
Crown durator in less than 60 feat halow the hottom of the buried waste	□ Vas □ Na
Ground water is less than 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 図 NA
Triff Office of the Date Diffined Triff Die Guardia Search, 6500, Data Southled Holl Realby Wells	
Ground water is between 50 and 100 feet below the bottom of the buried waste	Yes No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	⊠ NA
Ground water is more than 100 feet below the bottom of the buried waste.	Yes No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa	☐ Yes ⊠ No
lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	
- 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.	☐ Yes ☒ No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock	☐ Yes ☑ No
watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.	103 🔼 110
- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	1
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☒ No
adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Written commination of vermeation from the mainerparty, written approval obtained from the mainerparty	
Within 500 feet of a wetland.	☐ Yes ☑ No
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	
Within the area overlying a subsurface mine.	☐ Yes ⊠ No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Tes ☐ No
	i
Within an unstable area.	
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	☐ Yes 🛛 No
Society: Topographic map	ı
Within a 100-year floodplain.	☐ Yes ☑ No
- FEMA man	

closure plan. Please indicate, by a check mark in the box, that the documents ar  Protocols and Procedures - based upon the appropriate requirements of 19.13  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Soil Backfill and Cover Design Specifications - based upon the appropriate of Re-vegetation Plan - based upon the appropriate requirements of Subsection	5.17.13 NMAC puirements of Subsection F of 19.15.17.13 NMAC drill cuttings) requirements of Subsection H of 19.15.17.13 NMAC
Site Reclamation Plan - based upon the appropriate requirements of Subsect	
Waste Removal Closure For Closed-loop Systems That Utilize Haul-off Bins C	Only: (19.15.17.13.D NMAC) Instructions: Please indentify the facility
or facilities for the disposal of liquids, drilling fluids and drill cuttings.	
Disposal Facility Name: On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the	Disposal Facility Permit Number:
by a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of Proof of Surface Owner Notice - based upon the appropriate requirements of Construction and Design of Burial Trench (if applicable) based upon the appropriate requirements of 19.13   Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Uses Material Sampling Plan - based upon the appropriate requirements of Disposal Facility Name and Permit Number (for liquids, drilling fluids and of Soil Cover Design - based upon the appropriate requirements of Subsection Re-vegetation Plan - based upon the appropriate requirements of Subsection Site Reclamation Plan - based upon the appropriate requirements of Subsection	uirements of 19.15.17.10 NMAC f Subsection F of 19.15.17.13 NMAC propriate requirements of 19.15.17.11 NMAC 5.17.13 NMAC uirements of Subsection F of 19.15.17.13 NMAC Subsection F of 19.15.17.13 NMAC drill cuttings or in case on-site closure standards cannot be achieved) H of 19.15.17.13 NMAC L of 19.15.17.13 NMAC
Operator Application Certification:	
1 hereby certify that the information submitted with this application is true, accurate	te and complete to the best of my knowledge and belief.
Name (Print): LARRY SCHLOTTERBACK	Title: ENVIRONMENTAL COORDINATOR
Signature: Tauy Seattleber	Date:JULY 15, 2008
e-mail address:	Telephone: (505) 326-9200
OCD Approval: Permit Application (including closure plan)  Closure Plan	ın (only)
OCD Representative Signature: Brelo Bell	Approval Date:
OCD Representative Signature: Bull Sell	
OCD Representative Signature: Brelo Bell	OCD Permit Number:
OCD Representative Signature: Bull Pell  Title: Enviro / Spec	Approval Date: 7-18-08  OCD Permit Number:
Title:	Approval Date: 7-18-08  OCD Permit Number:
Title:	Approval Date: 7-18-08  OCD Permit Number:
Closure Report (required within 60 days of closure completion): Subsection R  Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternation  If different from approved plan, please explain.  Closure Report Attachment Checklist: Instructions: Each of the following item mark in the box, that the documents are attached.  Proof of Closure Notice Proof of Deed Notice (if applicable) Plot Plan Confirmation Sampling Analytical Results Waste Material Sampling Analytical Results Disposal Facility Name and Permit Number Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude Longitude	Approval Date: 7-18-08  OCD Permit Number:
Title:	Approval Date:
Title:	Approval Date: 7-18-08  OCD Permit Number:

## **BP AMERICA PRODUCTION COMPANY**

## San Juan Basin in Northwest New Mexico Temporary Pit General Design and Construction Plan

Pursuant to Rule 19.15.17.11 NMAC, BP America Production (BP) shall construct a temporary pit with the following guidelines. Any deviations from this plan will be addressed with the submittal of Form C-144 at the time of the pit permit application.

- A). The pit will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment.
- B) Prior to constructing a pit, top soil will be stripped for use as a final cover or fill at the time of closure.
- C) An upright sign, not less than 12" x 24" with lettering not less than 2" height will be placed on the fence surrounding the pit. Alternatively, a well sign in compliance with 19.15.3.103 NMAC will be posted at the well site. The sign will give BP's name, location by quarter-quarter or unit letter, section, township and range, and emergency phone numbers.
- D) As requested for Administrative approval, a fence will be constructed to 4 feet in height with hogwire design in a manner that prevents unauthorized access and kept in good repair. During well rig operations the fencing adjacent to the rig may be opened.
- E) The pit will be designed to ensure the confinement of liquids and prevent unauthorized releases. The base will be firm and unyielding, smooth and free of rocks, debris, sharp edges or irregularities. The pit will be constructed with a minimum 2:1 horizontal to vertical slope on all sidewalls. Adequate soil will be used to hold the anchor trench, prevent water run-on and prevent sidewall failure. Pit lining will be installed in a manner that avoids excessive stress-strain.
- F) The pit will be lined with a 20-mil string reinforced LLDPE or equivalent liner, composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. The liner shall be resistant to ultraviolet light and comply with EPA-846 Method 9090A.
- G) Liner orientation shall be placed to minimize seams and up and down, not across, slope. Factory welded seams will be used where possible. Prior to field seaming, liners will be overlapped by four to six inches and oriented parallel to the line of maximum slope. Only qualified personnel will perform field seaming.
- H) Construction will avoid excessive stress-strain on the liner.
- I) If protuberances or localized stress-strain may be present, a geo-textile will be placed below the liner to protect it's integrity.
- J) An anchor trench of at least 18" depth, filled with compacted dirt, will be used to hold the liner edges.
- K) Operations will be conducted to protect the liner from any fluid force into and suction out of the pit that could result in mechanical damage. Some mechanical device (header, manifold, diverter, perforated pipe, etc.) will be utilized to assure no damage will occur to the liner material.
- L) The pit will be designed with a small surface berm to prevent surface water run-on. During well rig operations a certain area of the pit may allow run-on of fluid from circulation or flow of the well.
- M) The pit volume shall not exceed 10 acre-feet, including freeboard.
- N) Certain parts of the pit may remain unlined, pursuant to Rule 19.15.17.11 F 11 NMAC, to allow well venting, flairing or blowing.
- O) Freestanding liquids will not be allowed to remain on any unlined portion of the temporary pit.

## BP AMERICA PRODUCTION COMPANY

## San Juan Basin in Northwest New Mexico Temporary Pit General Operating and Maintenance Plan

Pursuant to Rule 19.15.17.12 NMAC, BP America Production shall maintain and operate a temporary pit with the following guidelines. Any deviations from this plan will be addressed with the submittal of Form C-144 at the time of the pit permit application.

- A). The pit will be operated and maintained to contain liquids and prevent contamination of fresh water, protect public health and the environment.
- B) Well workover fluids will be re-used, recycled or disposed in a manner to protect fresh water, public health and the environment. Disposal is addressed in the "Closure Plan" for the site.
- C) No hazardous waste will be discharged or stored in the temporary pit. Only fluids generated during the well work process will be placed in the pit. The pit will remain free of solid waste or debris.
- D) If the pit develops a leak or if the liner is penetrated, including the freeboard portion of the pit, all liquids above the failure will be removed within 48 hours. The NMOCD Aztec District office will be notified within 48 hours and the liner will be either repaired or replaced. If the pit develops a leak or is penetrated anywhere above the freeboard portion of the pit, the NMOCD Aztec District office will be notified within 48 hours and the liner will be repaired.
- E) The pit liner will be protected from damage during fluid placement into or removal from by use of mud pit slides, headers or a manifold system.
- F) The pit will be operated with a small surface berm to prevent surface water run-on. During well rig operations a certain area of the pit may allow run-on of fluid from circulation or flow of the well.
- G) An oil absorbent boom will be maintained on site for removal of any oil from the pit surface.
- H) A minimum of 2 feet of freeboard will be maintained in the pit.
- The pit will be inspected at least daily while the rig is on site. Thereafter, the pit will be inspected at least weekly as long as fluids remain in the pit. An inspection log will be maintained, and will be submitted to the NMOCD Aztec District office when the pit is closed.
- J) All free liquids will be removed from the pit within 30 days from the date that the rig is released. The date of the rig release will be noted on Form C-103 or Form C-105.
- K) Free liquids will be removed from a pit used for cavitation within 48 hours after completing cavitation. BP may request additional time to remove liquids if it is not feasible to access the location for 48 hours.

### BP AMERCIA PRODUCTION COMPANY

#### SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### TEMPORARY PIT GENERAL CLOSURE PLAN

As stipulated in Rule 19.15.17.13 NMAC, the following information adheres to the requirements established in closing temporary pits (drilling and workover pits) on BP America Production Company (BP) well sites. This plan will address the standard protocols and procedures for closure of temporary pits. If deviations from this plan are necessary, any specific changes will be included with NMOCD Form C-144.

BP shall close its temporary pit(s) 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 or the environment. BP shall close any other permitted temporary pit within six months from the date that BP releases the drilling or workover rig. The date of the drilling or workover rig's release will be noted on either form C-105 or C-103 upon well or workover completion. It is understood that the division District III office in Aztec, New Mexico may grant an extension not to exceed three months. All necessary documentation to achieve closure will be as directed on NMOCD's form C-144.

The following outline addresses all requirements for closure of BP's temporary pits;

- 1. Removal of all liquids from the pit prior to closure and dispose of the liquids in a NMOCD division-approved facility or recycle, reuse or reclaim the liquids in a manner that the division District III office approves. A list of proposed, authorized and permitted disposal sites is included at the end of this plan.
- 2. BP's first option for closure will be on-site burial. BP shall demonstrate and comply with the siting requirements in Subsection C of 19.15.17.10 NMAC and the closure requirements and standards of Subsection F of 19.15.17.13 NMAC. If the site requirements dictate otherwise, waste excavation and removal (See item 7, below) will be implemented. Otherwise, an alternative method (presented to the environmental bureau in Santa Fe) may be presented to NMOCD for approval.
- 3. Notification to the surface owner by certified mail, with return receipt request, will be given prior to BP's intent on conducting, with NMOCD's pre-approval, on-site closure. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is understood to demonstrate compliance with this requirement.
- 4. In addition, notification will also be given to 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 well name and number to be closed, legal description utilizing unit letter, section, township, range, and API number.
- 5. Prior to in place closing an existing temporary pit, stabilization or solidification of its contents to a bearing capacity sufficient to support the pit's final cover will be completed. A mixture with soil or other material will not exceed a mixing ratio of 3:1, soil or other material to contents.
- 6. The pit content will be sampled by collecting, at a minimum, a five (5) point composite and adhering to 19.15.17.13F (2c or 2d). Based on the site criteria applied to the pit location, the following constituents will be analyzed by a qualified laboratory.

Constituents	Testing Method	Closure Standards
		(mg/Kg)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2
Total BTEX	US EPA Method SW-846 8021B or 8260B	50
TPH	US EPA Method SW-846 418.1	2,500
TPH	US EPA Method SW-846 8015M	500
	(GRO + DRO Combined Fraction)	
Chlorides	US EPA Method 300.1	1,000 (gw >100')

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, gw = groundwater, 50-100 or >100 = depths (in feet) below the bottom of the buried waste.

It is understood that BP has the option to collect a 5 point composite sample prior to treatment or stabilization to demonstrate that the contents do not exceed the closure limits. If however the pit contents collected prior to treatment or stabilization exceed the specified concentrations limits, then a second 5 point composite sample of the contents after treatment or stabilization will be collected to demonstrate that the contents do not exceed those limits.

7. If waste excavation and removal is performed, BP will follow 19.15.17.13B (1). This will include (a) excavation of all pit contents and, if applicable, synthetic liners and transferring those materials to a NMOCD approved facility, and (b) testing the soils below the temporary pit to determine whether a release has occurred. At a minimum, a 5 point composite soil sample will be collected and tested as follows:

Constituents	Testing Method	Closure Standards
		(mg/Kg)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2
Total BTEX	US EPA Method SW-846 8021B or 8260B	50
TPH	US EPA Method SW-846 418.1	2,500
TPH	US EPA Method SW-846 8015M	500
	(GRO + DRO Combined Fraction)	
Chlorides	US EPA Method 300.1	1,000  (gw > 100')

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, gw = groundwater, 50-100 or >100 = depths (in feet) below the bottom of the buried waste.

It is understood that BP has the option to collect a 5 point composite sample prior to treatment or stabilization to demonstrate that the contents do not exceed the closure limits. If however the pit contents collected prior to treatment or stabilization exceed the specified concentrations limits, then a second 5 point composite sample of the contents after treatment or stabilization will be collected to demonstrate that the contents do not exceed those limits.

- 8. Within 60 days of closure completion, submittal of a closure report on NMOCD's form C-144, with necessary attachments to document all closure activities including sampling results; information required by 19.15.17 NMAC; a plot plan; and details on back-filling, capping and covering, where and if applicable, will be furnished. BP will 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. BP will also provide a plat of the pit location on form C-105 within 60 days of closing the pit.
- 9. Upon closure of a temporary pit, BP shall cover the geomembrane lined, filled, temporary pit with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.
- 10. Reclamation will follow 19.15.17.13G (1) and (2).
  - a. Once closure has been achieved for the temporary pit, the pit location and any associated access road(s) will be reclaimed to a safe and stable condition that blends with the surrounding undisturbed area. The impacted surface area will be substantially restored to the condition that existed prior to operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, recontour 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.
- 11. Soil cover will follow 19.15.17.13H (1), (2), and (3).
  - a. The soil cover for closures where the pit contents has been removed or remediated to the division'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.
  - b. The soil cover for burial-in-place shall consist of a minimum of four feet of compacted, non-waste containing, earthen material. The soil cover shall include either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. In addition, the soil cover will be constructed to the site's existing grade and all possible efforts will be conducted to prevent ponding of water and erosion of the cover material.
- 12. Revegetation will follow 19.15.17.13I (1), (2), (3), (4) and (5).
  - a. Revegetation of the pit location and any associated access road(s) will be attempted during the first growing season after closure of the pit with seeding or planting of the disturbed areas. Seeding will be accomplished by tilling/plowing 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.
  - b. Seeding or planting will be repeated until it successfully achieves the required vegetative cover.

- c. When conditions are not favorable for the establishment of vegetation, such as periods of drought, it is understood that the division may allow sufficient time to delay seeding or planting until soil moisture conditions become favorable. In addition, the division may require BP to use additional cultural techniques such as mulching, fertilizing, irrigating, fencing or other practices.
- d. Notification will be given to the division District III office when seeding or planting has been successfully achieved.
- 13. The temporary pit will be located with a steel marker, no less than four (4) inches in diameter, cemented in a hole three (3) feet deep at the center of the on-site burial location at the time of abandonment of all wells on the well pad. The marker will be flush with the ground surface to allow access of the active well pad and for safety concerns. The marker will include a threaded collar to be used for future abandonment. The top of the marker will include a welded steel 12-inch square plate that indicates the onsite burial of the temporary pit. The plate will be easily removable and a four (4) foot steel riser will be threaded into the top of the collar marker and welded around the base with BP's name, well name and number, legal designation with unit letter, section, township range, and on-site burial label (i.e. temporary pit marker). The marker designation and label will be welded, stamped or otherwise permanently engraved into the metal of the steel marker. Permanent structures over the on-site burial will be prohibited without the division District III office's written approval. No person shall remove the on-site burial marker without the division's written permission.
  - a. The exact location of the on-site burial will be reported on NMOCD's form C-105.
  - b. A deed notice identifying the exact location of the on-site burial will be filed with the county clerk, located in Aztec, NM.
  - c. BP may request a modification to the marker, if, necessary activities and/or safety concerns develop in future efforts to increase production or during final plug and abandonment of the well itself. BP will adhere to the requirements of such a request as specified within 19.15.17.15A (1) NMAC.

#### Proposed waste disposal sites:

BP Crouch Mesa Landfarm, Permit NM-02-003

JFJ Landfarm, Permit NM-01-010(B)

Basin Disposal, Permit NM-01-0005

BP Operated E.E. Elliott SWD #1, API 30-045-27799

BP Operated 13 GCU SWD #1, API 30-045-28601

BP Operated GCU 259 SWD, API 30-045-20006

BP Operated GCU 306 SWD, API 30-045-24286

BP Operated GCU 307 SWD, API 30-045-24248

BP Operated GCU 328 SWD, API 30-045-24735

BP Operated Pritchard SWD #1, API 30-045-28351

## BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

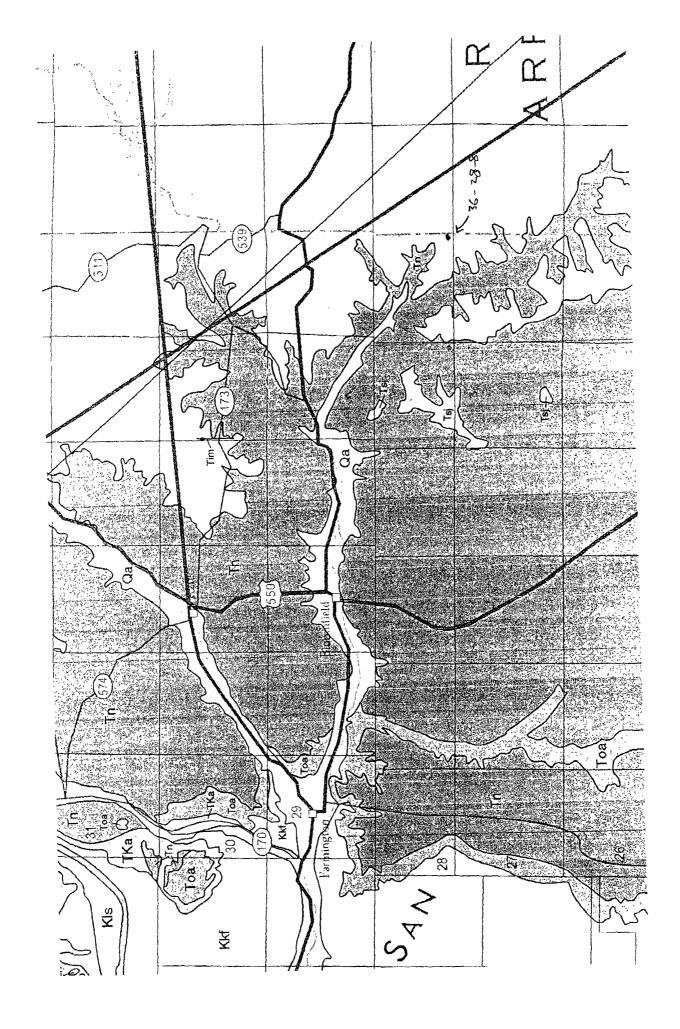
Phone: (505)632-1199 Fax: (505)632-3903

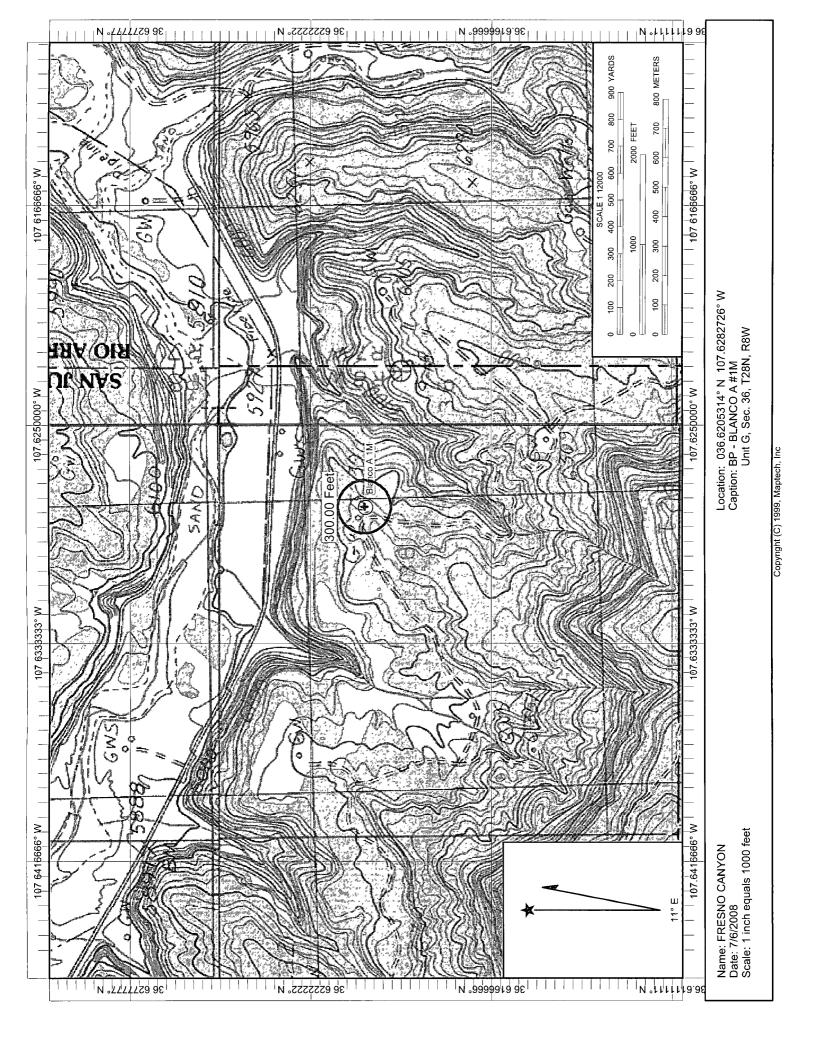
July 10, 2008

BP America Production Company Blanco A #1M API 30-045-32441 (G) Section 36 – T28N – R8W San Juan County, New Mexico

Surface Water and Groundwater Hydrogeologic Data, Soils, Geology and Topography (Pursuant to NMAC 19.15.17.9, Subsection B, Paragraph 2)

- 1) Soils: Surface soils at the proposed pit site are comprised of a silty sand that was artificially placed during well pad construction. The thickness of this sand is approximately 10 feet and overlies a dense sandstone surface that outcrops throughout the region (see Geology, below). Surrounding the site is a bedrock sandstone outcrop, covered with a thin layer (barren to 2± feet) of coarse grained sand.
- 2) Topography: The proposed pit site is located on a flat portion on the east side of the well pad. Surface drainage from this area of the well pad is towards the east, in a direction of an un-named drainage that flows northeast into the Carrizo Wash. Regionally the site is located on a mesa bench on the south side of the Carrizo Wash, about 340 feet above the wash bottom, with drainage primarily north. There are steep slopes and cliffs north and east leading down to the Carrizo. The topography towards the west and south includes mesas at a higher elevation that the well site.
- 3) Geology: Review of geologic maps published by the New Mexico Bureau of Geology and Mineral Resources, 2003, indicates the outcrop sandstone at the site is the San Jose Formation of Eocene age. This formation is a dense interbedded sequence of sandstones, siltstones and variegated shales, formed in a fluvial type environment. The elevation of the well pad is at approximately 6,240 feet and the Carrizo Wash, located about 1,500 feet north, is at an elevation of approximately 5,900 feet. A site inspection indicated that the sequence from the well pad surface to the wash surface, comprised of about 340 feet thickness, had a primary rock type of sandstone.
- 4) Surface Hydrology: Drainage from the proposed pit site is towards the east, based on surface topography. Visual inspection of the site did not present evidence that historical precipitation had made erosional channels that would harm the integrity of the pit site should a storm event occur while the pit is in use.
- 5) Groundwater Hydrology: As described above, an outcrop of approximate thickness of 340 feet is visible from the proposed pit location to the top of the Carrizo Wash. Inspection of this outcrop did not show the presence of seeps or vegetation to indicate the presence of perched groundwater. Groundwater in the Carrizo is anticipated to be within 10 feet of the surface of the wash. This groundwater would be expected to flow down wash, or in a westerly direction, based on surface topography. Based on this evidence, it is anticipated that groundwater is at least 340 feet below the base of the proposed temporary pit site. Other characteristics of the aquifer, including parameters such as transmissivity, porosity or permeability, are not pertinent to this data inquiry.
- 6) Ground Stability: The well pad and temporary pit site is located on a sandstone outcrop of the San Jose Formation. Visual inspection of the site did not show any faulting, fracturing, sink holes or erosional features that would indicate an unstable area. The site appears to be stable.

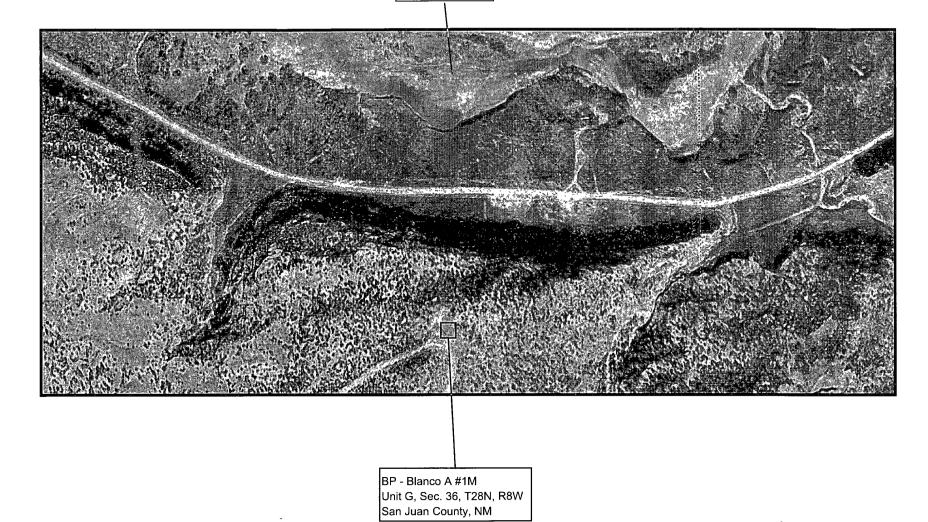




Live Search Maps

Page 1 of 1

Carrizo Creek



## New Mexico Office of the State Engineer POD Reports and Downloads

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Township:	28N Range: 08W Sec	ctions: 36			
NAD27 X: 5	60000 Y: 2050000 Zo	one: W	Search Radius	: 10	
County: SJ	Basin: SJ(San Juan)	Nu	ımber:	Suffix:	
Owner Name: (First)	(Last)		○Non-Domestic	O Domestic	All
POD://Surface Data	Report Avg Dept	th.to.Water.Repo	ort Wate	er-Column-Repor	t,
	Clear Form iW	ATERS Menu	Help		
		, magazan di antara di ant			West-100 (1994)
	WATER COLUMN	REPORT 07/0	6/2008		

(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are biggest to smallest) Tws Rng Sec q q q Zone X

Depth Depth Water (in feet)
Well Water Column

No Records found, try again

POD Number

## New Mexico Office of the State Engineer POD Reports and Downloads

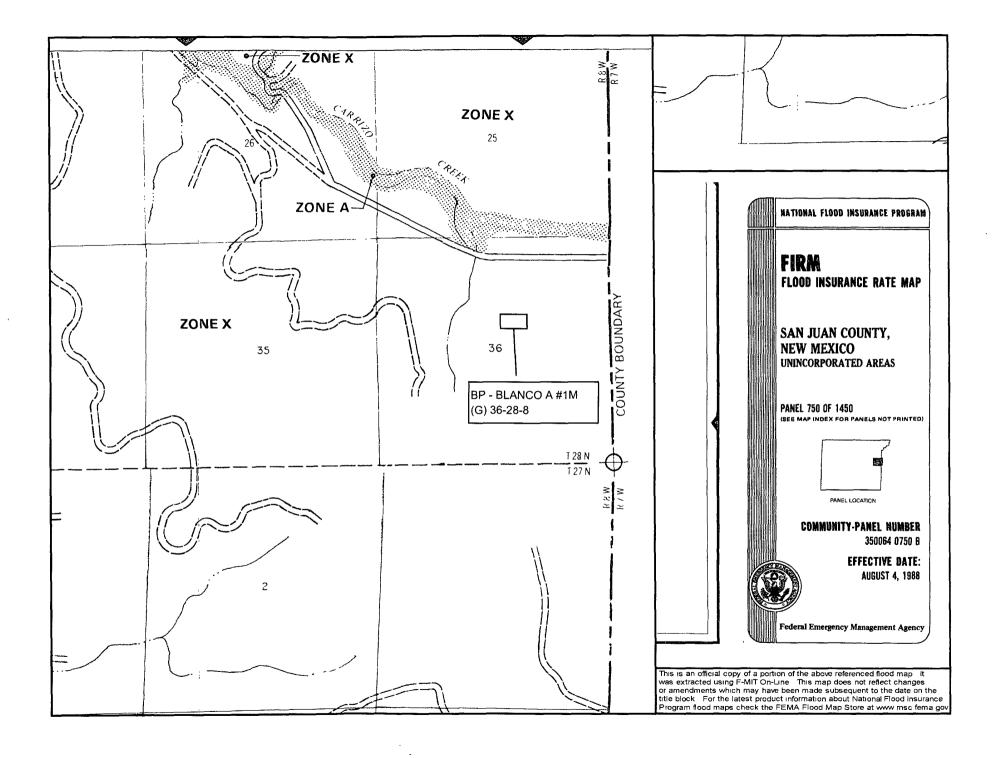
•
Township: 28N Range: 08W Sections:
NAD27 X: Y: Zone: Search Radius:
County: Basin: Number: Suffix:
Owner Name: (First) (Last) C Non-Domestic C Domestic 6 All
POD / Surface Data Report Avg Depth to Water Report Water Column Report
Clear Form WATERS Menu Help

#### WATER COLUMN REPORT 07/07/2008

(quarters are 1=NW 2=NE 3=SW 4=SE)

(qu	arter	s are	e bi	gge	es:	t to	smallest)			Depth	Depth	Water	(in fee	:t)
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SJ 02283	28N	08W	14	4	2	1				540	480	60		
SJ 00209	28N	08W	17	3	2	1				15				
SJ 00209 -AMENDED-S	28N	08W	17	4	1	1				15				
SJ 00209 S	28N	08W	17	4	1	1				15		15		
SJ 00163 S	28N	08W	18	4	4	2				1450	800	650		

Record Count: 5



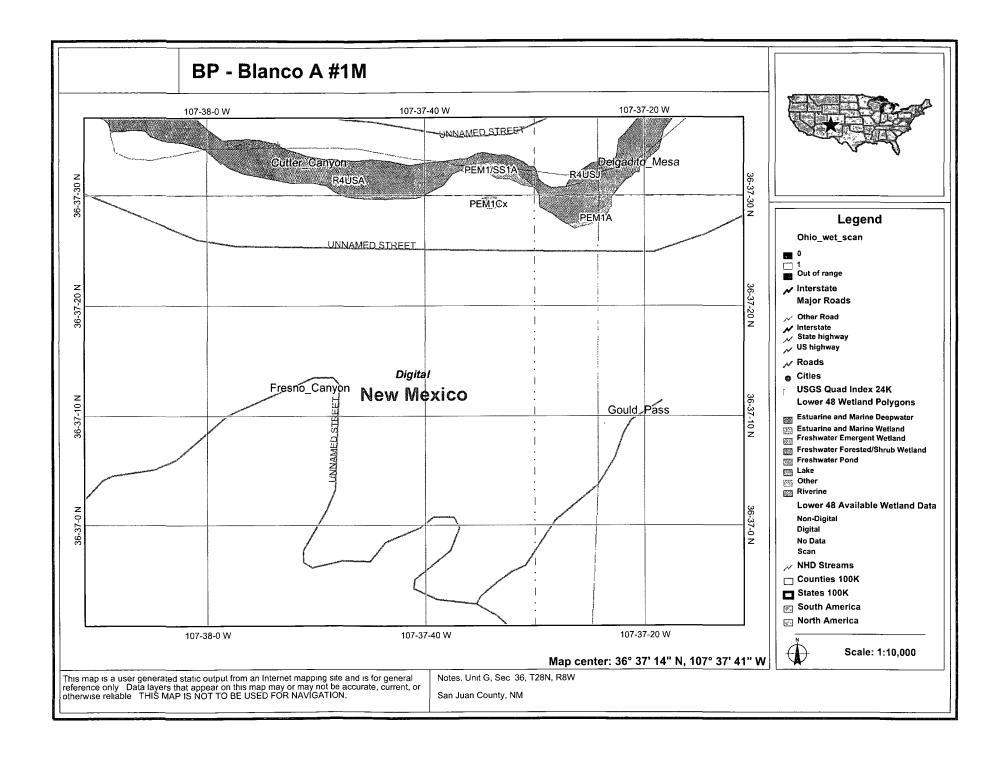
## **Definitions of FEMA Flood Zone Designations**

Flood zones are geographic areas that the FEMA has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Map. Each zone reflects the severity or type of flooding in the area.

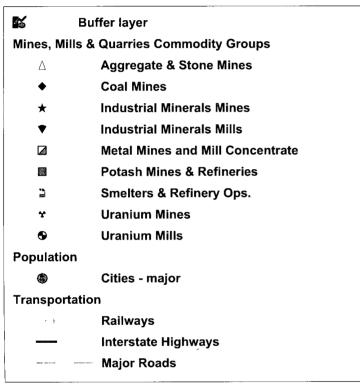
#### **Moderate to Low Risk Areas**

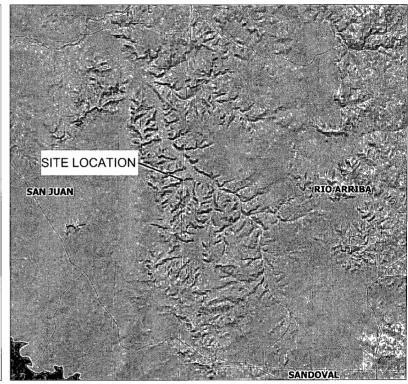
In communities that participate in the NFIP, flood insurance is available to all property owners and renters in these zones:

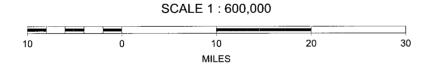
ZONE	DESCRIPTION
B, C, and X	Areas outside the 1-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.



## BP - Blanco A #1M (Mine, Mills, and Quarries Web Map)









CLIENT: AMOCO LOCATION NO: 80772 BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 C.O.C. NO: \_\_\_\_ (505) 632-1199FIELD REPORT: CLOSURE VERIFICATION PAGE No: \_\_/\_ of \_\_/ DATE STARTED 7/26/00 LOCATION: NAME BLANCO A WELL # IE PIT ABAN. I DATE FINISHED QUAD/UNIT C SEC. 36 TWP: 28N RNG 8W PM NM CNTY: ST NM ENVIRONMENTAL QTR/FOOTAGE: 800 2 1530 W LENW CONTRACTOR: P + 5 SPECIALIST: EXCAVATION APPROX 23 FT. x 24 FT. x 4 FT. DEEP. CUBIC YARDAGE 60 DISPOSAL FACILITY: ON-STIE REMEDIATION METHOD. LANDFORM LAND USE: KANGE LEASE: SF-012201 FORMATION FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY 98 FT. N80E FROM WELLHEAD. DEPTH TO GROUNDWATER. >100' NEAREST WATER SOURCE: >1000' NEAREST SURFACE WATER: >1000' CHECK DNE : NMGCD RANKING SCORE \_\_\_\_ NMGCD TPH CLOSURE STD: 5000 PPM PIT ABANDONED OVM CALIB. READ. \$1.6 ppm SDIL AND EXCAVATION \_\_\_ STEEL TANK INSTALLED TIME: 7:40 am/pm 7/26/00 \_\_\_\_ FIBERGLASS TANK INSTALLED DESCRIPTION: " SIDEWALLS - MOD. YELL. BROWN SAND, NON COHESIVE, TLIGHTLY MOIST, FIRM, NO APPACENT OSCOLORATION OBSERVED OR HE OPOR DETECTED. BOTTOM - BEDROCK (SANDSTONE) VERY POLE ORANGE (MOSTLY), VERY HARD, SLIGHT HC ODOR DETECTED & OUM SAMPLE. BEDROCK P+A'0 - 6/16/00 BUTTOM (22) FIELD 418.1 CALCULATIONS WEIGHT (9) ML FREON DILUTION READING CALC ppm SAMPLE I.D. LAB No TIME SCALE nez' 1310 TPH-2080 ND FT PIT PROFILE PIT PERIMETER OVM RESULTS FIELD HEADSPACE PID (ppm) 0.0 70 3 @ <u>6.0</u> 4 @ 2 1 0.0 5 e 4 A BEDKOCK (55) LAB SAMPLES TRAVEL NOTES: CALLOUT 7/25/00 - AFTER ONSITE 7/26/00 - AFTER.

3004525296

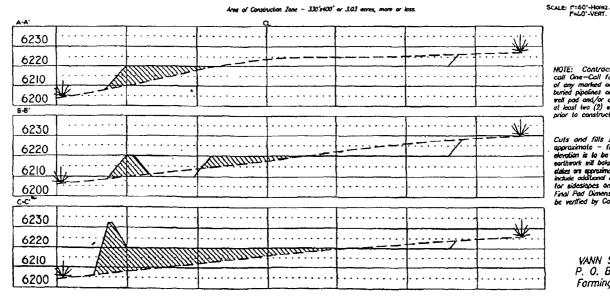
O66 aa	State of a	New Mexico	Form C-103
Office District !	Energy, Minerals	and Natural Resources	March 4, 2004
1625 N. French Dr., Hobbs, NM 88240	65.		WELL API NO.
District II	OIL CONSERV	ATION DIVISION	30-045-32441
1301 W. Grand Ave., Artesia, NM 88210 District III			5. Indicate Type of Lease
1000 Rio Brazos Rd., Aztec, NM 87410		St. Francis Dr.	STATE FEE
District IV	Santa Fe	, NM 87505	6. State Oil & Gas Lease No.
1220 S. St. Francis Dr., Santa Fe, NM			
87505	ICES AND REPORTS OF	I WELVETTE	
(DO NOT USE THIS FORM FOR PROPE			7. Lease Name or Unit Agreement Name
DIFFERENT RESERVOIR. USE "APPL			Blanco A
PROPOSALS.)	(A)	DEC 30 ON	(Federal well NMNM 012201)
1. Type of Well:		No 5000	8. Well Number
Oil Well Gas Well	Other $\square$	Col.	1 M
			1 171
2. Name of Operator	ازدے	, 47.3 W. SI	9. OGRID Number
BP AMERICA PRODUCTION	co		000778
3. Address of Operator		Channelly	10. Pool name or Wildcat
P.O. BOX 3092 HOUSTON, TX	K 77079-2064	01 11 31 31	Basin Dk & Blanco MV
4. Well Location	***************************************		
W W Con Document			
Unit Letter G: 17	85 feet from the North	line and 1490 fee	t from the EAST line
			and and areas and
Section 36	Township 28N	Range 08W	NMPM SAN JUAN County
	11. Elevation (Show wh	ether DR, RKB, RT, GR, etc	
		6218' GR	
Pit or Below-grade Tank Application (F.	or pit or below-grade tank closs	ires, a form C-144 must be attach	ned)
Pit Location: UL G Sect 36 Twi	28N Rng 08W Pit type I	Drilling Depth to Groundwater	>100' Distance from nearest fresh water well >1000'
Distance from nearest surface water >			
1750' feet from the North line and 1	4/5 reet from the _EAST_lines	' PLEASE SEE A LUACHED PA	DIAVOUT ;
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## PAD LAYOUT PLAN & PROFILE BP AMERICA PRODUCTION COMPANY

Blanco A # IM
1785'1755' F/NL 1488" F/EL 1490' FEL
SEC. 36, T28N, R8W, N.M.P.M.
SAN JUAN COUNTY, NEW MEXICO

Lat: 36°37'13" Long: 107°37'42" В Α С (B) T (O) @ F 12 F 10 PROPOSED FLARE PIT PROPOSED Į\$; RESERVE PIT 8 Mud Tanks **⊕**C4 ELEV. 6218 S 25° W 150' 150 LAYDOWN 20.20 Proposed Access Road @U6 150 150 B' C MOTES: Reserve Pil Dike - Should be 8' above Deep side (overflow - 3' mide & 1' above shallow side).

Flore Pil - Overflow pipe should be hallowy between lop and bottom and extend over passic liner and into flore pil. -400' CONSTRUCTION ZONE



NOTE: Contractor should call One—Call for location of any marked or unmarked buried pipelines or cables on well pod and/or occess road at least lev (2) warking days prior to construction.

Cuts and fills shown are approximate — final finished elevation is to be adjusted so earthwark will belance. Comer states are approximate and do not include additional areas needed for sidestapes and drainages. Final Pad Dimensions are to be werified by Controctor.

VANN SURVEYS P. O. Box 1306 Farmington, NM



**BP America Production Company** 

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

July 7, 2008

Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

RE: Notice of Proposed Temporary Pit Construction

Blanco A 1M

Unit G, Section 36, Township 28N, Range 8W

Dear Mr. Herman Lujan:

In regards to the captioned subject and requirements of the new NMOCD pit rule, this letter is notification that BP America Production Company is planning to close the proposed temporary pit that will be used for workover operations on this location.

Should you have any questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely.

Larry Schlotterback

Field Environmental Coordinator