District III

1301 W Grand Ave., Artesia, NM 88210

1000 Rio Brazos Rd , Aztec, NM 87410

State of New Mexico Energy Minerals and Natural Resources

Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

July 21, 2008 For temporary pits, closed-loop sytems, 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 copy to the

<u>District IV</u> 1220 S St Francis Dr., Santa Fe. NM 87505			Environmental Bureau o appropriate NMOCD Dis	ffice and provide a copy to the strict Office
1220 S St Francis DI , Santa Pe. IVW 6/303	Pit, Closed-Loop System,	Below-Grade	Tank or	
3028 Prope	osed Alternative Method Po			<u>cation</u>
Type of action:	X Permit of a pit, closed-loop system	em, below-grade tar	nk, or proposed alte	ernative method
	Closure of a pit, closed-loop sys	tem, below-grade ta	ank, or proposed alt	ernative method
	Modification to an existing perm	nit		
	Closure plan only submitted for		ed or non-permitted	l pit, closed-loop system,
	below-grade tank, or proposed a			
	pplication (Form C-144) per individ	• •		-
- · ·	of this request does not relieve the operator of liab seve the operator of its responsibility to comply w	•	•	*
Operator: ConocoPhillips Compan	v	(OGRID#: 217817	,
Address: PO Box 4289, Farmingto			<u> </u>	
Facility or well name: San Juan 30				
		OCD Permit Number:		
U/L or Otr/Otr: J(NWSE) Section		Range: 5	W County: R	io Arriba
Center of Proposed Design: Latitud		Longitude:	107.305496'W	NAD: X 1927 1983
Surface Owner: X Federal		bal Trust or Indian		
String-Reinforced	Cavitation P&A iner type: Thickness mil actory Other	о		Other x W x D
Type of Operation: P&A Drying Pad X Above Ground Unlined Line	ion H of 19.15.17.11 NMAC Drilling a new well X Workover or notice of inte and Steel Tanks Haul-off Bins cr type: Thickness mil actory Other	nt) Other	ctivities which requir	other 10111213747576
4 Below-grade tank: Subsection Volume:	I of 19.15.17.11 NMAC bl Type of fluid:			PILCONS. DIV. DIST. 3
Tank Construction material:				K VIL GOING. DIV. DISI, 3
Secondary containment with leak d	etection Visible sidewalls, liner	r, 6-inch lift and auton	natic overflow shut-o	
Visible sidewalls and liner	Visible sidewalls only Oth		·	-0572820
Liner Type Thickness	mil HDPE PVC	Other		
5 Alternative Method: Submittal of an exception request is re	guired. Exceptions must be submitted to	the Santa Fe Environ	mental Rureau office	for consideration of approval

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pit, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)					
Four foot height, four strands of barbed wire evenly spaced between one and four feet					
Alternate. Please specify					
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other Monthly inspections (If netting or screening is not physically feasible)					
Signs: Subsection C of 19.15.17.11 NMAC 12" X 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers X Signed in compliance with 19.15.3.103 NMAC					
Administrative Approvals 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:	-				
Administrative approval(s) Requests must be submitted to the appropriate division district of the Santa Fe Environmental Bureau office for consideration of approval.					
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 watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes	□No			
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	Yes	□No			
(Applies to temporary, emergency, or cavitation pits and below-grade tanks)	□NA				
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applied to permanent pits)	Yes NA	∐No			
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<u></u>				
Within 500 horizonal 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.	Yes	∐No			
- NM Office of the State Engineer - iWATERS database search; 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 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 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 Taples), based upon the requirements of Paperson (A) of Sylvection P. of 10.15.17.0 NMA.C.				
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				
19.15.17.9 NMAC and 19.15.17 13 NMAC				
Previously Approved Design (attach copy of design) API or Permit				
12 Clared by Survey Branch A. P. of Ave I. of Clared by Survey Branch A. P. of Ave I. of Clared by Survey Branch B. of Clared by Survey B. of Clared				
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 documents are attached Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9				
Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC				
Sating Citiena Compilative Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC X Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC				
X Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC				
X 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				
Previously Approved Operating and Maintenance Plan API				
13				
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 (I) 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 H2S, Prevention Plan				
Emergency Response Plan				
Oil Field Waste Stream Characterization				
Monitoring and Inspection Plan				
Erosion Control Plan				
Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17 13 NMAC				
14				
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 X Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank X 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)				
In-place Burial On-site Trench				
Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)				
15 W. F. G. Liver Ch. Div. Cl. Liver Co. Cl. Liver Ch. Cl.				
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 F 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 I of 19.15.17 13 NMAC				
Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC				

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Waste Removal Closure For Closed-loop Systems That Utilize Above Closure for the day of the forest transfer of the day of	Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)				
Instructions Please identify the facility or facilities for the disposal of liquities are required	nas, ariting futus and artit cuttings. Ose attachment if more than two	0			
Disposal Facility Name: Envirotech	Disposal Facility Permit #: NM-01-0011				
Disposal Facility Name: Basin Disposal Facility Disposal Facility Permit #: NM-0		····			
Will any of the proposed closed-loop system operations and associ		e service and			
Required for impacted areas which will not be used for future service and	the appropriate requirements of Subsection H of 19.15.17.13 N	NMAC			
Site Reclamation Plan - based upon the appropriate requirem	ents of Subsection G of 19 15 17 13 NMAC				
Siting Criteria (Regarding on-site closure methods only: 19 15 1 Instructions Each sitting criteria requires a demonstration of compliance in the clos certain siting criteria may require administrative approval from the appropriate dis office for consideration of approval Justifications and/or demonstrations of equiva	swe plan Recommendations of acceptable source material are provided belos strict office or may be considered an exception which must be submitted to the S tlency are required Please refer to 1915 17.10 NMAC for guidance	Santa Fe Environmental Bureau			
Ground water is less than 50 feet below the bottom of the buried w - NM Office of the State Engineer - iWATERS database search, USG		Yes No			
Ground water is between 50 and 100 feet below the bottom of the	hymiad wasta				
- NM Office of the State Engineer - iWATERS database search; USG		Yes No			
Ground water is more than 100 feet below the bottom of the buried	d waste.	Yes No			
- NM Office of the State Engineer - (WATERS database search, USG	□ N/A				
Within 300 feet of a continuously flowing watercourse, or 200 feet of any (measured from the ordinary high-water mark)	other significant watercourse or lakebed, sinkhole, or playa lake	Yes No			
- Topographic map; Visual inspection (certification) of the proposed s	ate				
Within 300 feet from a permanent residence, school, hospital, institution, c - Visual inspection (certification) of the proposed site; Aerial photo, sa	••	Yes No			
		Yes No			
Within 500 horizontal feet of a private, domestic fresh water well or spring purposes, or within 1000 horizontal fee of any other fresh water well or sp NM Office of the State Engineer - iWATERS database; Visual inspe	oring, in existence at the time of the initial application				
Within incorporated municipal boundaries or within a defined municipal fre pursuant to NMSA 1978, Section 3-27-3, as amended	·	Yes No			
Written confirmation or verification from the municipality, Written a Within 500 feet of a wetland	approval obtained from the municipality				
US Fish and Wildlife Wetland Identification map; Topographic map	y; Visual inspection (certification) of the proposed site	Yes No			
Within the area overlying a subsurface mine.		Yes No			
- Written confiramtion or verification or map from the NM EMNRD-Mining and Mineral Division					
Within an unstable area - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources, USGS; NM Geological Society;		Yes No			
Topographic map		[
Within a 100-year floodplain FEMA map		Yes No			
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instruction by a check mark in the box, that the documents are attached.	ons: Each of the following items must bee attached to the cl	osure plan. Please indicate,			
Siting Criteria Compliance Demonstrations - based upon the					
Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC					
	Construction/Design Plan of Burnal Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC					
Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC					
i i she keciamadon rian - based ubon the addrodriate reduirei	ments of subsection C of 19.15.17.13 NMAC				

Operator Application C	'artification		
Operator Application C I hereby certify that the info	rmation submitted with this application is true, accur	rate and complete to the be	est of my knowledge and belief.
Name (Print):	Kelly Jeffery	Title:	Regulatory Technician
Signature:	2/20/1	Date:	6-11-09
e-mail address:	jeffekr@conocophillips.com	Telephone:	505-599-4025
20			
OCD Approval:	ermit Application (including closure plan)	Closure Plan (only)	OCD Conditions (see attachment)
OCD Representative Signature	gnature:		Approval Date: 2-2-09
Title	Equipo (Spec	OCD Power	nit Number
Title:	LAUINO SPRE	OCD Pern	nit Number:
21			
	ed within 60 days of closure completion): Suit		
=			e activities and submitting the closure report. The closure Please do not complete this section of the form until an
	been obtained and the closure activities have been co		
		Closur	e Completion Date:
22			
Closure Method:			
Waste Excavation a	nd Removal On-site Closure Method	Alternative Closure	Method Waste Removal (Closed-loop systems only)
If different from app	proved plan, please explain.		
23			
	Waste Removal Closure For Closed-loop System	s That Utilize Above Gro	ound Steel Tanks or Haul-off Bins Only:
Instructions: Please identify were utilized.	y the facility or facilities for where the liquids, drill	ling fluids and drill cutting	gs were disposed. Use attachment if more than two facilities
Disposal Facility Name:		Disposal Facility	Permit Number
Disposal Facility Name		Disposal Facility	
Were the closed-loop sys	stem operations and associated activities performed	on or in areas that will not	be used for future service and opeartions?
Yes (If yes, please d	demonstrate complilane to the items below)	No	
	reas which will not be used for future service and of	perations	
Site Rectamation (P	Photo Documentation)		
	scation Rates and Seeding Technique		
24 Closure Report Atta	chment Checklist: Instructions: Each of the fol	lowing items must be attac	ched to the closure report. Please indicate, by a check mark in
the box, that the docume	ents are attached.		
<u> </u>	Notice (surface owner and division)		
	tice (required for on-site closure) site closures and temporary pits)		
_			
	npling Analytical Results (if applicable) ampling Analytical Results (if applicable)		
	Name and Permit Number		
	nd Cover Installation		
· = ·	plication Rates and Seeding Technique		
Site Reclamation	(Photo Documentation)		
On-site Closure L	ocation: Latitude	Longitude:	NAD 1927 1983
25			
Operator Closure Certi			
	ormation and attachments submitted with this closure If applicable closure requirements and conditions sp	*	and complete to the best of my knowledge and belief. I also certify that consure plan
•	, appreciate costine regimements una continuons sp	•	
Name (Print):		Title:	
Signature:		Date:	
a mail addrass:		Telephone:	,

ConocoPhillips Company Closed-loop Plans

Closed-loop Design Plan

COPC's closed loop system will not entail a drying pad, temporary pit, below grade tank or sump. It will include an above ground tank suitable for holding the cuttings and fluids for rig operations. The tank will be sufficient volume to maintain a safe free board between disposal of the liquids and solids from rig operations.

- 1. Fencing is not required for an above ground closed-loop system
- 2. It will be signed in compliance with 19.15.3.103 NMAC
- 3. A frac tank will be on location to store fresh water

Closed-loop Operating and Maintenance Plan

COPC's closed-loop tank will be operated and maintained to contain liquids and solids in order to prevent contamination of fresh water sources, in order to protect public health and the environment. To ensure the operation is maintained the following steps will be followed:

- 1. The liquids will be vacuumed out and disposed of at the Basin Disposal facility (Permit # NM-01-005). Solids in the closed-loop tank will be vacuumed out and disposed of at Envirotech (Permit # NM-01-0011) on a periodic basis to prevent over topping.
- 2. No hazardous waste, miscellaneous solid waste or debris will be discharged into or stored in the tank. Only fluids or cutting used or generated by rig operations will be placed or stored in the tank.
- 3. The division district office will be notified within 48 hours of the discovery of compromised integrity of the closed-loop tank. Upon the discovery of the compromised tank, repairs will be enacted immediately
- 4. All of the above operations will be inspected and a log will be signed and dated. During rig operations the inspection will be daily.

Closed-loop Closure Plan

The closed-loop tank will be closed in accordance with 19.15.17.13. This will be done by transporting cuttings and all remaining sludges to Envirotech (Permit # NM-01-0011) immediately following rig operations. All remaining liquids will be transported and disposed of in the Basin Disposal facility (Permit # NM-01-005). The tanks will be removed from the location as part of the rig move. At time of well abandonment, the site will be reclaimed and re-vegetated to pre-existing conditions when possible.