

# **AE Order Number Banner**

#### **Report Description**

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pCS1705256763

144B - 15844
BEELINE GAS SYSTEMS

2/22/2018

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 April 3, 2017

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

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

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application
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.
Operator: Elm Ridge Exploration Co. LLC dba Beeline Gas Systems OGRID #: 194503
Address: #20 CR 5060, Bloomfield, NM 87413
Facility or well name: Buena Suerte Compressor Station- North below grade tank
API Number: OCD Permit Number: 15845
U/L or Qtr/QtrJ Section32 Township26N Range11W County:_San Juan
Surface Owner: ☐ Federal ☑ State ☐ Private ☐ Tribal Trust or Indian Allotment
Center of Proposed Design: Latitude 36.43347 Longitude 108.016795 NAD: 83 Surface Owner: Federal State Private Tribal Trust or Indian Allotment    Private   Tribal Trust or Indian Allotment   Private   Priv
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
3.
Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume:85bbl Type of fluid: compressed liquids (H20 & HC), skid drain liquid
Tank Construction material:Welded Steel
☐ 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: Thicknessunknownmil
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, institution or church)	hospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify: Facility is surrounded by a 6' pro panel fence	
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	
9	
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:	
<ul> <li>□ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.</li> <li>□ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.</li> </ul>	
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 acceptance are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.  - ☑ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells	☐ Yes ☑ No ☐ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
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. ( <b>Does not apply to below grade tanks</b> )  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	p - p
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☑ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	☐ Yes ☐ No
application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300 feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	Yes No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.	
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached.    Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC   Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC   Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC   Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC   Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC   Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC   Previously Approved Design (attach copy of design)   API Number: or Permit Number: or Permit Number:	NMAC 15.17.9 NMAC
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 docattached.  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  A List of wells with approved application for permit to drill associated with the pit.  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC  Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Previously Approved Design (attach copy of design)  API Number:	.15.17.9 NMAC
— Trainer.	

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
### 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 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	
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 F. Alternative  Proposed Closure Method: Waste Excavation and Removal	luid Management Pit
<ul> <li>□ Waste Removal (Closed-loop systems only)</li> <li>□ On-site Closure Method (Only for temporary pits and closed-loop systems)</li> <li>□ In-place Burial □ On-site Trench Burial</li> <li>□ Alternative Closure Method</li> </ul>	
14.  Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a closure plan. Please indicate, by a check mark in the box, that the documents are attached.  □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	attached to the
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC <u>Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.</u>	
Ground water is less than 25 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
- TEMA map	
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan by a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
17. Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	ef.
Name (Print): Title:	
Signature: Date:August 21, 2017	
e-mail address:Telephone:	
18.  OCD Approval: Permit Application (including clasure plan) Closure Plan (enly) OCD Conditions (see attachment)	
	12010
OCD Representative Signature: Approval Date: 22	40018
Title: Environmental Specalist 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	the closure report. complete this
☐ Closure Completion Date: 10/30/2017	
20.     Closure Method:     Waste Excavation and Removal □ On-Site Closure Method □ Alternative Closure Method □ Waste Removal (Closed-lo □ If different from approved plan, please explain.	op systems only)
Closure Method:  ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-log Closed-log C	

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): <u>Dianna Hamilton</u> Title: <u>Health Safety & Environmental Specialist</u>

Signature: Date: October 31, 2017

e-mail address: dhamilton@djrllc.com Telephone: (505 634-1144 x205

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY				
<ul> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mallplece, or on the front if space permits.</li> <li>Article Addressed to:</li> <li>UNOCO RIDBRAZOS RA</li> <li>ACHCC MM S7410</li> </ul>	A. Signature  X. D. Agent  Addresse  B. Received by (Printed Name)  C. Date of Deliver  Addresse  L. 23/17  D. Is delivery address different from item 1?  If YES, enter delivery address below:  No				
	3. Service Type ☐ Adult Signature ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail®	☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Return Receipt for Merchandise			

November 20, 2017

NMOCD 1000 Rio Brazos Road Aztec, NM 87410

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Return Receipt Requested 7015 0640 0005 8540 0588

Subject: Notification of Closure-Buena Suerte Compressor station

To whom it may concern,

DJR Operating (previously Elm Ridge Exploration dba Beeline Gas Systems) is submitting this notification of closure for pits that are on the Buena Suerte Compressor station. Please see attached approved C- 144 and closure plan for further details.

If you have any questions or comments please feel free to contact me at the above number or by email at <a href="mailton@djrllc.com">dhamilton@djrllc.com</a>

Sincerely,

Dianna Hamilton HSE Specialist

Attachments: C-144 forms

Sampling results

Manna Hamieter

Proof of notice to NM state land office

Photos C-141

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		Age Add
1. Article Addressed to: NM State Land office	D. Is delivery address different from item 1?  If YES, enter delivery address below:	Yes No
310 Santa Fe Trail Santa Fe, Nm 87501		
	3. Service Type  Adult Signature Adult Signature Restricted Delivery Certified Mail® Certified Mail® Collect on Delivery Collect on Delivery Collect on Delivery Restricted Delivery Signature Collect on Delivery Restricted Delivery Signature Co	Mail Ro

November 20, 2017

New Mexico State Land Office 310 Old Santa Fe Trail Santa Fe, NM 87501

PS Form 3811, April 2015 PSN 7530-02-000-9053

Return Receipt Requested 7015 0640 0005 8540 0571

Subject: Notification of Closure- Buena Suerte Compressor station

To whom it may concern,

DJR Operating (previously Elm Ridge Exploration dba Beeline Gas Systems) is submitting this notification of closure for pits that are on the Buena Suerte Compressor station. Please see attached approved C- 144 and closure plan for further details.

If you have any questions or comments please feel free to contact me at the above number or by email at <a href="mailto:dhamilton@djrllc.com">dhamilton@djrllc.com</a>

Sincerely, Dianna Hamilton

Dianna Hamilton HSE Specialist

Attachments: C-144 forms

Sampling results

Proof of notice to NMOCD

Photos C-141

DJR Operating, LLC

PO Box 1280 Bloomfield, NM 87413 (505) 634-1144

August 31, 2017

Santa Fe, NM 87501 310 Old Santa Fe Trail New Mexico State Land Office

Subject: Notification of Closure- Buena Suerte Compressor station

To whom it may concern,

opportunity to witness soil sampling as described in the closure plans. sampling to be completed on Tuesday September 12th at 1:00 pm to allow State personnel the attached approved C-144 and closure plan for further details. Also please note notification for notification of closure for pits that are on the Buena Suerte Compressor station. Please see DJR Operating (previously Elm Ridge Exploration dba Beeline Gas Systems) is submitting this

email at dhamilton@djrllc.com If you have any questions or comments please feel free to contact me at the above number or by

Sincerely,

Dianna Hamilton **HSE** Coordinator

Attachments: C-144 forms Closure Plans document

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON D	DELIVERY
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.  1. Article Addressed to:  NM State Land Office 310 Old Santa Fe Trail  Santa Fe, NM 8750/	B. Received by (Printer Name)  D. Is delivery address different from If YES, enter delivery address by	
9590 9403 0227 5146 0948 30	☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail®	☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Return Receipt for
2. Article Number (Transfer from service label)	☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery	Merchandise  Misignature Confirmation™  Signature Confirmation

7015 0640 0005 8540 0540

sured Mail
sured Mail Restricted Delivery
ver \$500)

☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation Restricted Delivery

**Domestic Return Receipt** 

PS Form 3811, April 2015 PSN 7530-02-000-9053

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

1220 S. St. Francis Dr., Santa Fe, NM 87505

Name of Company: Elm Ridge E

# State of New Mexico Energy Minerals and Natural Resources

Revised August 8, 2011

Form C-141

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release	e Notification	on and Corrective	Action	1		
		<b>OPERATOR</b>		☐ Initial Report	$\boxtimes$	Final Report
Exploration kna	DJR operating	Contact: Dianna Hamilt	on 330-273	36		
ld, NM 87413		Telephone No. 634-114	4			
e Comp. 1	V. Tank	Facility Type: ()M)	rissor	Station	, II	
JM	Mineral Owner	:		API No. n/a		
	LOCATIO	ON OF RELEASE				
					-	

Address: #20 CR 5060 Bloomfie Facility Name: 1000 Surface Owner: Township 24 N Unit Letter County Range Feet from the North/South Line | Feet from the | East/West Line Longitude: - 108.016795 Latitude: 36.43347 NATURE OF RELEASE Type of Release: Volume of Release: NA Volume Recovered: Date and Hour of Occurrence Source of Release: Was Immediate Notice Given? If YES, To Whom? ☐ Yes ☐ No ☐ Not Required By Whom? Dianna Hamilton Date and Hour Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. ☐ Yes ☐ No If a Watercourse was Impacted, Describe Fully Describe Cause of Problem and Remedial Action Taken.\* NIA Describe Area Affected and Cleanup Action Taken. \* Soil Sampling was conducted and withoussed by Cory Smith. Sel attached results I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. OIL CONSERVATION DIVISION milton Approved by Environmental Specialist: Printed Name: Dianna Hamilton Title: HSE Coordinator **Expiration Date:** Approval Date: E-mail Address: dhamilton@djrllc.com Conditions of Approval: Attached

Date: December 20, 2017 Phone: 505-330-2736 \* Attach Additional Sheets If Necessary



75 Suttle Street Durango, CO 81303 970.247.4220 Phone 970.247.4227 Fax www.greenanalytical.com

29 September 2017

Dianna Hamilton
DJR Operating
#20 CR 5060
Bloomfield, NM 87413

RE: BTEX,TPH, CI

Enclosed are the results of analyses for samples received by the laboratory on 09/15/17 12:55. If you need any further assistance, please feel free to contact me.

Sincerely,

Debbie Zufelt

Reports Manager

Dellie Zufett

All accredited analytes contained in this report are denoted by an asterisk (\*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at <a href="http://greenanalytical.com/certifications/">http://greenanalytical.com/certifications/</a>

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water through the Colorado Department of Public Health and Environment and EPA region 8.



www.GreenAnalytical.com

DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

#### ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
N. S1	1709124-01	Solid	09/15/17 11:20	09/15/17 12:55
N. S2	1709124-02	Solid	09/15/17 11:20	09/15/17 12:55

Green Analytical Laboratories

Deldie Zufett



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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

N. S1

1709124-01 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analys
General Chemistry									
% Dry Solids	93.8			%	1	09/29/17	EPA160.3/1684	H1	LLG
Soluble (DI Water Extraction)									
Chloride	16.9	10.7	1.53	mg/kg dry	10	09/28/17	EPA300.0		JDA
Subcontracted Cardinal Labora	atories								
Volatile Organic Compounds by EPA M	Method 8021								
Benzene*	< 0.050	0.050	0.002	mg/kg	50	09/22/17	8021B		MS
Toluene*	< 0.050	0.050	0.002	mg/kg	50	09/22/17	8021B		MS
Ethylbenzene*	< 0.050	0.050	0.004	mg/kg	50	09/22/17	8021B		MS
Total Xylenes*	< 0.150	0.150	0.010	mg/kg	50	09/22/17	8021B		MS
Total BTEX	< 0.300	0.300	0.018	mg/kg	50	09/22/17	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			108 %	72-148		09/22/17	8021B		MS
Petroleum Hydrocarbons by GC FID									
GRO C6-C10	<10.0	10.0	3.53	mg/kg	1	09/21/17	8015B		MS
DRO >C10-C28	<10.0	10.0	2.04	mg/kg	1	09/21/17	8015B		MS
EXT DRO >C28-C36	47.7	10.0	2.04	mg/kg	1	09/21/17	8015B		MS
Surrogate: 1-Chlorooctane			104 %	28.3-164		09/21/17	8015B		MS
Surrogate: 1-Chlorooctadecane			109 %	34.7-157		09/21/17	8015B		MS

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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

N. S2

1709124-02 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analys
General Chemistry									
% Dry Solids	93.9			%	1	09/29/17	EPA160.3/1684	Н1	LLG
Soluble (DI Water Extraction)									
Chloride	17.0	10.6	1.53	mg/kg dry	10	09/28/17	EPA300.0		JDA
Subcontracted Cardinal Labor	atories								
Volatile Organic Compounds by EPA	Method 8021								
Benzene*	< 0.050	0.050	0.002	mg/kg	50	09/22/17	8021B		MS
Toluene*	< 0.050	0.050	0.002	mg/kg	50	09/22/17	8021B		MS
Ethylbenzene*	< 0.050	0.050	0.004	mg/kg	50	09/22/17	8021B		MS
Total Xylenes*	< 0.150	0.150	0.010	mg/kg	50	09/22/17	8021B		MS
Total BTEX	< 0.300	0.300	0.018	mg/kg	50	09/22/17	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			108 %	72-148		09/22/17	8021B		MS
Petroleum Hydrocarbons by GC FID									
GRO C6-C10	<10.0	10.0	3.53	mg/kg	1	09/21/17	8015B		MS
DRO >C10-C28	11.1	10.0	2.04	mg/kg	1	09/21/17	8015B		MS
EXT DRO >C28-C36	61.4	10.0	2.04	mg/kg	1	09/21/17	8015B		MS
Surrogate: 1-Chlorooctane			105 %	28.3-164		09/21/17	8015B		MS
Surrogate: 1-Chlorooctadecane			113 %	34.7-157		09/21/17	8015B		MS

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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

#### **General Chemistry - Quality Control**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Datah D700224 Canaval Dwan Wat Cham										

#### Batch B709234 - General Prep - Wet Chem

Duplicate (B709234-DUP1)	Source: 170	9124-01 Prepare	d: 09/28/17 Analyzed: 09/29/17			
% Dry Solids	93.7	%	93.8	0.0597	20	

# Soluble (DI Water Extraction) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B709188 - General Prep - Wet Chem										
Blank (B709188-BLK1)			Prepa	red: 09/25/	17 Analyz	ed: 09/28/1	7			
Chloride	ND	1.00	mg/kg wet							
LCS (B709188-BS1)			Prepa	red: 09/25/	17 Analyz	ed: 09/28/1	7			
Chloride	244	10.0	mg/kg wet	250		97.4	85-115			
LCS Dup (B709188-BSD1)			Prepa	red: 09/25/	17 Analyz	ed: 09/28/1	7			
Chloride	245	10.0	mg/kg wet	250		97.9	85-115	0.467	20	

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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

# Volatile Organic Compounds by EPA Method 8021 - Quality Control

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 7092109 - Volatiles										
Blank (7092109-BLK1)			Prep	pared: 09/21/	17 Analyze	ed: 09/22/1	7			
Surrogate: 4-Bromofluorobenzene (PID)	0.0561		mg/kg	0.0500		112	72-148			
Benzene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
LCS (7092109-BS1)			Prep	pared: 09/21/	17 Analyze	ed: 09/22/1	7			
Surrogate: 4-Bromofluorobenzene (PID)	0.0555		mg/kg	0.0500		111	72-148			
Benzene	1.97	0.050	mg/kg	2.00		98.3	79.5-124			
Ethylbenzene	1.91	0.050	mg/kg	2.00		95.4	77.7-125			
Toluene	1.82	0.050	mg/kg	2.00		91.1	75.5-127			
Total Xylenes	5.73	0.150	mg/kg	6.00		95.4	70.9-124			
LCS Dup (7092109-BSD1)			Prep	pared: 09/21/	17 Analyze	ed: 09/22/1	7	×		
Surrogate: 4-Bromofluorobenzene (PID)	0.0550		mg/kg	0.0500		110	72-148			
Benzene	1.96	0.050	mg/kg	2.00		98.0	79.5-124	0.292	6.5	
Ethylbenzene	1.91	0.050	mg/kg	2.00		95.5	77.7-125	0.0216	7.83	
Toluene	1.81	0.050	mg/kg	2.00		90.6	75.5-127	0.577	7.02	
Total Xylenes	5.72	0.150	mg/kg	6.00		95.4	70.9-124	0.0613	7.78	

Green Analytical Laboratories

Deldie Zufett



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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

# Petroleum Hydrocarbons by GC FID - Quality Control

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 7092010 - General Prep - Organics										
Blank (7092010-BLK1)			Prepa	ared & Anal	yzed: 09/20	)/17				
Surrogate: 1-Chlorooctadecane	52.6		mg/kg	50.0		105	34.7-157			
Surrogate: 1-Chlorooctane	49.2		mg/kg	50.0		98.4	28.3-164			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C35	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							
Total TPH C6-C28	ND	10.0	mg/kg							
LCS (7092010-BS1)			Prepa	ared & Anal	yzed: 09/20	)/17				
Surrogate: 1-Chlorooctadecane	55.9		mg/kg	50.0		112	34.7-157			
Surrogate: 1-Chlorooctane	52.5		mg/kg	50.0		105	28.3-164			
DRO >C10-C28	196	10.0	mg/kg	200		98.0	81.4-124			
GRO C6-C10	183	10.0	mg/kg	200		91.7	76.6-119			
Total TPH C6-C28	379	10.0	mg/kg	400		94.8	79.4-121			
LCS Dup (7092010-BSD1)			Prep	ared & Anal	yzed: 09/20	)/17				
Surrogate: 1-Chlorooctadecane	56.0		mg/kg	50.0		112	34.7-157			
Surrogate: 1-Chlorooctane	53.0		mg/kg	50.0		106	28.3-164			
DRO >C10-C28	196	10.0	mg/kg	200		98.1	81.4-124	0.105	9.83	
GRO C6-C10	184	10.0	mg/kg	200		92.0	76.6-119	0.349	7.94	
Total TPH C6-C28	380	10.0	mg/kg	400		95.0	79.4-121	0.223	8.57	

Green Analytical Laboratories

Deldie Zufett



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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

H1

Project Name / Number: [none]

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/29/17 13:43

#### **Notes and Definitions**

Sample was received several days after collected and subsequently analyzed past hold time.

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

\*Results reported on as received basis unless designated as dry.

RPD Relative Percent Difference

LCS Laboratory Control Sample (Blank Spike)

RL Report Limit

MDL Method Detection Limit

Green Analytical Laboratories

Deldie Zufett



#### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

4es 200/200-1
des 300/300-1
des 300/300
405 300/34
405 300 L
465 300
45 3
465
465
3     3
19
tlsoever shall be deemed waived unless made in writing and received s arising out of or related to the performance of services hereunder
Report to State? (Circle)
Yes No
u
la la

<sup>†</sup> GAL cannot always accept verbal changes. Please fax or email written change requests.

\* Chain of Custody must be signed in "Reliquished By:" as an acceptance of services and all applicable charges.

# Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems Buena Suerte Compressor Station Registration of New Below-Grade Tank

## Closure Plan

In accordance with 19.15.17.13 NMAC, the following plan describes the closure requirements of the new below-grade tank (BGT) in the Buena Suerte Compressor Station (BSCS) owned and operated by Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems (BGS). BSCS is located in San Juan County approximately 20 miles, by road, southwest of Bloomfield, NM.

## Closure Requirements Where Wastes are to be Disposed of Off-site

- 1. BGS shall dispose of all wastes at a division-approved facility.
- 2. BGS shall not commence closure without first obtaining approval of the closure plan submitted with this registration.
- BGS shall close the BGT by first removing all contents and, if applicable, synthetic liners and transferring those materials to a division-approved facility.
- 4. BGS shall test the soils beneath the BGT as follows:
  - a. At a minimum, a five-point composite sample to include any obvious stained or wet soils, or other evidence of contamination shall be taken under the liner or BGT and that sample shall be analyzed for the constituents listed in Table 1 of 19.15.17.13 NMAC (below).
  - b. If any contaminant concentration is higher than the parameters listed in Table 1 of 19.15.17.13 NMAC (below) the division may require additional delineation upon review of the results and BGS must obtain approval before proceeding with closure.
  - c. If all contaminant concentrations are less than or equal to the parameters listed in Table 1 of 19.15.17.13 NMAC (below), then BGS may proceed to backfill the excavation with division approved soil cover.

	Tab r Soils Beneath Below-G -Loop Systems and Pits	Grade Tanks, Drying Pad	
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
	Chloride	EPA 300.0	600 mg/kg
≤50 feet	ТРН	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

# Closure Plan (Continued)

	Soils Beneath Below-	Continued) Grade Yanks, Drying Pad	
Closed-l	Loop Systems and Pit	s where Contents are Rer	
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
	Chloride	EPA 300.0	10,000 mg/kg
51 feet-100 feet	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 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
	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 8021B or 8260B	50 mg/kg
>100 feet	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

# <u>Timing Requirements and Closure Methods for Below-Grade Tanks</u>

- 1. Within 60 days of cessation of operations, BGS shall remove liquids and sludge from the BGT prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.
- 2. Within six (6) months of cessation of operations, BGS shall remove the BGT and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division office approves. If there is any equipment associated with the BGT, then BGS shall remove the equipment, unless the equipment is required for some other purpose.
- 3. BGS shall notify the surface owner by certified mail, return receipt requested, that BGS plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Notice shall include operator name, facility name, NMOCD permit number, and location to be closed by unit letter, section, township, and range.
- 4. BGS shall notify the appropriate division office by certified mail, return receipt requested, that BGS plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Notice shall include operator name, facility name, NMOCD permit number, and location to be closed by unit letter, section, township, and range.

# Closure Plan (Continued)

# Reclamation of BGT Locations

## 1. Site Contouring

- a. Once the area associated with the BGT is no longer in use, BGS shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BGS shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) 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 Paragraph (5) in Subsection H of 19.15.17.13 MMAC.
- b. BGS may propose an alternative to the re-vegetation or recontouring requirement if BGS demonstrates to the appropriate district office that the proposed alternative provides equal or better prevention of erosion, and protection of fresh water, public health, and the environment. The proposed alternative shall be agreed upon by the surface owner. BGS shall submit the proposed alternative, with written documentation that the surface owner agrees to the alternative, to the division for approval.
- c. In areas reasonably needed for production operations, BGS shall compact, cover, pave, or otherwise stabilize and maintain the areas in such a way as to minimize dust and erosion to the extent practicable.

# 2. Soil Cover Designs for a BGT

- a. The soil cover for closures after site contouring, where BGS has removed the BGT, contents, and liner, and if necessary remediated the soil beneath the BGT, shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.
- b. BGS shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

#### 3. Reclamation and Re-vegetation

- a. In areas no longer in use, except for areas reasonably needed for production operations, BGS shall reclaim all areas disturbed by the closure of the BGT as early and as nearly as practicable to their original condition or their final land use and BGS shall maintain the areas to control dust and minimize erosion to the extent practicable.
- b. BGS shall replace topsoil and subsoil to their original relative position and contoured so as to achieve erosion control, long-term stability, and preservation of surface water flow patterns. The disturbed area shall be reseeded in the first favorable growing season following closure of the BGT.
- c. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at

# Closure Plan (Continued)

the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

- d. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supercede these provisions and govern the obligations of BGS, if subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health, and the environment.
- e. BGS shall notify the division when reclamation and re-vegetation are complete.

# **Closure Report**

- 1. Within 60 days of closure completion, BGS shall submit a closure report on Form C-144, with necessary attachments to document all closure activities including sampling results; information on back-filling, capping, and covering, where applicable. In the closure report, BGS shall certify that all information in the report and attachments is correct and that BGS has complied with all applicable closure requirements and conditions specified in the closure plan.
- 2. The closure report will include the following:
  - a. Proof of closure notice to surface owner and NMOCD:
  - b. Back-filling and cover installation;
  - c. Analytical results of confirmation sampling;
  - d. Disposal facility name(s) and permit number(s);
  - e. Application rate and seeding techniques if the entire facility is to be reclaimed:
  - f. Photo documentation of the reclamation.

# Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems Buena Suerte Compressor Station Registration of New Below-Grade Tank

# **Exceptions and Variances**

In accordance with 19.15.17.15 NMAC, regarding the proposed new below-grade tank (BGT) in the Buena Suerte Compressor Station (BSCS) owned and operated by Elm Ridge Exploration Co., LLC d.b.a. Beeline Gas Systems (BGS), we request the following exceptions and variances (E&V).

- 1. BGS desires to use a Rufco 4000B LLDPE liner as an alternative to a liner made from HDPE or PVC. The Rufco liner is 40-mils thick and we believe it to be as good or better than a 30-mil HDPE or PVC liner. A liner is not required for the double-wall, double-bottom tank BGS will install. The liner we plan to install is an additional level of protection to prevent contamination of fresh water; and to protect public health and the environment in the unlikely event of an overflow of the BGT. Please see the attached specifications for the Rufco liner.
- 2. BGS requests a variance to the requirement of stockpiling the topsoil from the excavation for this BGT. The tank will be located in an active compressor station with limited storage area. BGS proposes to use the soil from this excavation to backfill the excavation for another BGT we plan to close in the near future. BGS will sample and test the soil from the excavation for the new BGT and use it for backfill material only if the concentration of all constituents listed in Table 1 of 19.15.17.13 NMAC are less than or equal to the limits listed in the table. If the concentration of any of the listed constituents are greater than the limits listed in the table, the excavated soil will be disposed of in a division-approved facility.
- 3. BGS requests a variance to placing a sign on the fence surrounding the BGT. Because the BGT is to be located in a compressor station that is totally surrounded by a 6-foot propanel fence, BGS proposes to locate the required sign in a conspicuous place on the outside of the facility fence.
- 4. BGS requests a variance to testing for TPH by the EPA SW-846 Method 418.1. BGS proposes to use the EPA SW-846 Method 8015 Extended to test for GRO, DRO, and MRO.



75 Suttle Street Durango, CO 81303 970.247.4220 Phone 970.247.4227 Fax www.greenanalytical.com

26 September 2017

Dianna Hamilton
DJR Operating
#20 CR 5060
Bloomfield, NM 87413

RE: BTEX,TPH, CI

Enclosed are the results of analyses for samples received by the laboratory on 09/12/17 15:45. If you need any further assistance, please feel free to contact me.

Sincerely,

Debbie Zufelt

Reports Manager

Deldie Zufett

All accredited analytes contained in this report are denoted by an asterisk (\*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at <a href="http://greenanalytical.com/certifications/">http://greenanalytical.com/certifications/</a>

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water through the Colorado Department of Public Health and Environment and EPA region 8.



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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: Buena Suerte N & E Pits

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/26/17 13:02

#### ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
N. Pit S1	1709091-01	Solid	09/12/17 14:05	09/12/17 15:45
N. Pit S2	1709091-02	Solid	09/12/17 14:05	09/12/17 15:45
E. Pit S1	1709091-03	Solid	09/12/17 14:00	09/12/17 15:45
E. Pit S2	1709091-04	Solid	09/12/17 14:00	09/12/17 15:45

Green Analytical Laboratories

Deldie Zufett



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DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: Buena Suerte N & E Pits

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/26/17 13:02

#### E. Pit S1

1709091-03 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Soluble (DI Water Extraction)									
Chloride	85.4	10.6	1.52	mg/kg dry	10	09/22/17	EPA300.0		JDA
Subcontracted Cardinal Labor	atories								
Volatile Organic Compounds by EPA	Method 8021								
Benzene*	< 0.050	0.050	0.002	mg/kg	50	09/20/17	8021B		MS
Toluene*	< 0.050	0.050	0.002	mg/kg	50	09/20/17	8021B		MS
Ethylbenzene*	< 0.050	0.050	0.004	mg/kg	50	09/20/17	8021B		MS
Total Xylenes*	< 0.150	0.150	0.010	mg/kg	50	09/20/17	8021B		MS
Total BTEX	< 0.300	0.300	0.018	mg/kg	50	09/20/17	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			100 %	72-148		09/20/17	8021B		MS
Petroleum Hydrocarbons by GC FID									
GRO C6-C10	<10.0	10.0	3.53	mg/kg	1	09/17/17	8015B		MS
DRO >C10-C28	11.7	10.0	2.04	mg/kg	1	09/17/17	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	2.04	mg/kg	1	09/17/17	8015B		MS
Surrogate: 1-Chlorooctane			91.8 %	28.3-164		09/17/17	8015B		MS
Surrogate: 1-Chlorooctadecane			89.9 %	34.7-157		09/17/17	8015B		MS

Green Analytical Laboratories

Deldie Zufett



www.GreenAnalytical.com

DJR Operating

Project: BTEX,TPH, Cl

#20 CR 5060

Project Name / Number: Buena Suerte N & E Pits

Reported:

Bloomfield NM, 87413

Project Manager: Dianna Hamilton

09/26/17 13:02

#### E. Pit S2

1709091-04 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Soluble (DI Water Extraction)									
Chloride	69.3	10.8	1.55	mg/kg dry	10	09/22/17	EPA300.0		JDA
Subcontracted Cardinal Labor	atories								
Volatile Organic Compounds by EPA M	Method 8021								
Benzene*	< 0.050	0.050	0.002	mg/kg	50	09/20/17	8021B		MS
Toluene*	< 0.050	0.050	0.002	mg/kg	50	09/20/17	8021B		MS
Ethylbenzene*	< 0.050	0.050	0.004	mg/kg	50	09/20/17	8021B		MS
Total Xylenes*	< 0.150	0.150	0.010	mg/kg	50	09/20/17	8021B		MS
Total BTEX	< 0.300	0.300	0.018	mg/kg	50	09/20/17	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			101 %	72-148		09/20/17	8021B		MS
Petroleum Hydrocarbons by GC FID									
GRO C6-C10	<10.0	10.0	3.53	mg/kg	1	09/17/17	8015B		MS
DRO >C10-C28	35.7	10.0	2.04	mg/kg	1	09/17/17	8015B		MS
EXT DRO >C28-C36	28.0	10.0	2.04	mg/kg	1	09/17/17	8015B		MS
Surrogate: 1-Chlorooctane			97.6 %	28.3-164		09/17/17	8015B		MS
Surrogate: 1-Chlorooctadecane			106 %	34.7-157		09/17/17	8015B		MS

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Project: BTEX,TPH, Cl

#20 CR 5060

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Bloomfield NM, 87413

Project Manager: Dianna Hamilton

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RPD

#### Soluble (DI Water Extraction) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B709128 - General Prep - Wet Chem										
Blank (B709128-BLK1)			Prepa	ared: 09/18/17	7 Analyz	ed: 09/22/1	7			
Chloride	ND	10.0	mg/kg wet							
LCS (B709128-BS1)			Prepa	ared: 09/18/17	7 Analyz	ed: 09/22/1	7			
Chloride	242	10.0	mg/kg wet	250		96.8	85-115			
LCS Dup (B709128-BSD1)			Prepa	ared: 09/18/17	7 Analyz	ed: 09/22/1	7			
Chloride	240	10.0	mg/kg wet	250		95.9	85-115	0.980	20	

#### Volatile Organic Compounds by EPA Method 8021 - Quality Control

Spike

Source

%REC

Reporting

Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes			
Batch 7091904 - Volatiles													
Blank (7091904-BLK1)	Prepared: 09/19/17 Analyzed: 09/20/17												
Surrogate: 4-Bromofluorobenzene (PID)	ND		mg/kg	0.0500		98.9	72-148						
Benzene	ND	0.050	mg/kg										
Ethylbenzene	ND	0.050	mg/kg										
Toluene	ND	0.050	mg/kg										
Total BTEX	ND	0.300	mg/kg										
Total Xylenes	ND	0.150	mg/kg										
LCS (7091904-BS1)	Prepared: 09/19/17 Analyzed: 09/20/17												
Surrogate: 4-Bromofluorobenzene (PID)	0.0489		mg/kg	0.0500		97.7	72-148						
Benzene	2.23	0.050	mg/kg	2.00		112	79.5-124						
Ethylbenzene	2.12	0.050	mg/kg	2.00		106	77.7-125						
Toluene	2.06	0.050	mg/kg	2.00		103	75.5-127						
Total Xylenes	6.28	0.150	mg/kg	6.00		105	70.9-124						
LCS Dup (7091904-BSD1)	Prepared: 09/19/17 Analyzed: 09/20/17												
Surrogate: 4-Bromofluorobenzene (PID)	0.0501		mg/kg	0.0500		100	72-148						
Benzene	2.19	0.050	mg/kg	2.00		109	79.5-124	2.13	6.5				
Ethylbenzene	2.08	0.050	mg/kg	2.00		104	77.7-125	1.94	7.83				
Toluene	2.01	0.050	mg/kg	2.00		100	75.5-127	2.29	7.02				
Total Xylenes	6.21	0.150	mg/kg	6.00		104	70.9-124	1.07	7.78				
Matrix Spike (7091904-MS1)	Sour	ce: H702491-	-07 Prep	ared: 09/19/	17 Analyz	ed: 09/20/1	7						
Surrogate: 4-Bromofluorobenzene (PID)	0.0487		mg/kg	0.0500		97.4	72-148						
Benzene	1.79	0.050	mg/kg	2.00	ND	89.5	70.9-127						

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# Volatile Organic Compounds by EPA Method 8021 - Quality Control (Continued)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 7091904 - Volatiles (Continued)										
Matrix Spike (7091904-MS1) (Continued)	Sour	ce: H702491-	-07 Prep	ared: 09/19/	17 Analyze	ed: 09/20/1	7			
Ethylbenzene	1.71	0.050	mg/kg	2.00	ND	85.5	38.8-164			
Toluene	1.65	0.050	mg/kg	2.00	ND	82.4	46-161			
Total Xylenes	5.15	0.150	mg/kg	6.00	ND	85.9	41.9-151			
Matrix Spike Dup (7091904-MSD1)	Sour	ce: H702491	-07 Prep	ared: 09/19/	17 Analyze	ed: 09/20/1	7			
Surrogate: 4-Bromofluorobenzene (PID)	0.0495		mg/kg	0.0500		99.0	72-148			
Benzene	1.76	0.050	mg/kg	2.00	ND	88.2	70.9-127	1.44	3.45	
Ethylbenzene	1.68	0.050	mg/kg	2.00	ND	83.9	38.8-164	1.88	4.92	
Tr. 1	1.62	0.050	mg/kg	2.00	ND	80.8	46-161	1.98	5.27	
Toluene	1.02									

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#### Petroleum Hydrocarbons by GC FID - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 7091502 - General Prep - Organics			J						METATOCOS.	10000000
			Derror	1. 00/15	/17 Anal	-d. 00/17/1	7			
Blank (7091502-BLK1)			Prep	ared: 09/15/	/1/ Analyz					
Surrogate: 1-Chlorooctadecane	54.9		mg/kg	50.0		110	34.7-157			
Surrogate: 1-Chlorooctane	51.8		mg/kg	50.0		104	28.3-164			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C35	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							
Total TPH C6-C28	ND	10.0	mg/kg							
LCS (7091502-BS1)			Prep	ared: 09/15/	/17 Analyz	ed: 09/17/1	7			
Surrogate: 1-Chlorooctadecane	55.1		mg/kg	50.0		110	34.7-157			
Surrogate: 1-Chlorooctane	56.5		mg/kg	50.0		113	28.3-164			
DRO >C10-C28	188	10.0	mg/kg	200		94.0	81.4-124			
GRO C6-C10	181	10.0	mg/kg	200		90.5	76.6-119			
Total TPH C6-C28	369	10.0	mg/kg	400		92.2	79.4-121			
LCS Dup (7091502-BSD1)			Prep	oared: 09/15	/17 Analyz	ed: 09/17/1	7			
Surrogate: 1-Chlorooctadecane	54.0		mg/kg	50.0		108	34.7-157			
Surrogate: 1-Chlorooctane	56.3		mg/kg	50.0		113	28.3-164			
DRO >C10-C28	186	10.0	mg/kg	200		92.9	81.4-124	1.21	9.83	
GRO C6-C10	179	10.0	mg/kg	200		89.7	76.6-119	0.835	7.94	
Total TPH C6-C28	365	10.0	mg/kg	400		91.3	79.4-121	1.03	8.57	
Matrix Spike (7091502-MS1)	Sou	rce: H702472-	10 Prep	oared: 09/15	/17 Analyz	ed: 09/17/1	7			
Surrogate: 1-Chlorooctadecane	50.6		mg/kg	50.0		101	34.7-157			
Surrogate: 1-Chlorooctane	51.2		mg/kg	50.0		102	28.3-164			
DRO >C10-C28	184	10.0	mg/kg	200	ND	91.8	18.2-177			
GRO C6-C10	176	10.0	mg/kg	200	ND	88.0	39.3-131			
Total TPH C6-C28	360	10.0	mg/kg	400	2.85	89.2	30-150			
Matrix Spike Dup (7091502-MSD1)	Sou	rce: H702472-	10 Prep	pared: 09/15	/17 Analyz	ed: 09/17/1	7			
Surrogate: 1-Chlorooctadecane	51.6		mg/kg	50.0		103	34.7-157			
Surrogate: 1-Chlorooctane	51.9		mg/kg	50.0		104	28.3-164			
DRO >C10-C28	187	10.0	mg/kg	200	ND	93.7	18.2-177	2.05	22.5	
GRO C6-C10	178	10.0	mg/kg	200	ND	89.0	39.3-131	1.18	18.5	
Total TPH C6-C28	365	10.0	mg/kg	400	2.85	90.7	30-150	1.64	117	

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#### **Notes and Definitions**

DET Ana

Analyte DETECTED

ND

Analyte NOT DETECTED at or above the reporting limit

NR

Not Reported

dry

Sample results reported on a dry weight basis

\*Results reported on as received basis unless designated as dry.

RPD LCS Relative Percent Difference

LCS

Laboratory Control Sample (Blank Spike)

RL

Report Limit

MDL

Method Detection Limit

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#### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

0

(970) 247-4220

service@greenanalytical.com or dzufelt@greenanalytical.com

of 0 Fax: (970) 247-4227 75 Suttle St Durango, CO 81303 Page **ANALYSIS REQUEST** Bill to (if different): Company or Client: P.O. #: Company: Attn: Contact Person: DIANNA HAMILTON

Email Report to: Chami Hon Edir II C. Com

Project Name(optional): Bulna Suerte N + E Pits Address: City: State: Zip: Phone #: Email: Sampler Name (Print): Collected Matrix (check one) # of containers GROUNDWATER SURFACEWATER WASTEWATER DRINKING WATER PRODUCEDWATER Sample Name or Location For Lab Use OTHER HNO<sub>3</sub> Date Time 9/12/17 2:05 2:05 X 2:00 2:00 X PLEASE NOTE: GAL's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and receiver by GAL within 30 days after completion. In no event shall GAL be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by GAL, regardless of whether such claim is based upon any of the above stated reasons or otherwise Relinquished By:

pate: | Date: | ADDITIONAL REMARKS: Report to State? (Circle) Received By Received By: Relinquished By: Date: Time:

CHECKED BY

<sup>\*</sup> Chain of Custody must be signed in "Reliquished By:" as an acceptance of services and all applicable charges.