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

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State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application Type of action: Below grade tank registration Permit of a pit or proposed alternative method Gloz G O ddd Modification to an existing permit/or registration Gloz G O ddd Modification to an existing permit/or registration Gloz G O ddd 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: BP AMERICA PRODUCTION CO OGRID #: 778 Address: 1199 Main Ave., Suite 101, Durango, CO 81301 PCS 190 983 7932 Facility or well name: Horse Canyon Compressor APPNumber: PLA033009 OCD Permit Number: U/L or Qtr/Qtr L Section 3.0 Township 30.0N Range 9W County: San Juan County Center of Proposed Design: Latitude 36.838081 Longitude -107.774495 NAD: [1927] 1983								
Surface Owner: Federal X State Private Tribal Trust or Indian Allotment								
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								
3. X Below-grade tank: Subsection I of 19.15.17.11 NMAC TANK ID: A								
Volume: 95 bbl Type of fluid: Produced Water Tank Construction material: Steel Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls and liner Visible sidewalls only Image: Single Walled Double Bottom Sidewalls and liner mil HDPE PVC Other Other Other								
 Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. 								
 5. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify								

Oil Conservation Division

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other Monthly inspections (If netting or screening is not physically feasible) Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks. **General siting** Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. ☐ Yes 🗶 No ☐ NA □ NM Office of the State Engineer - iWATERS database search; □ USGS; I Data obtained from nearby wells Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit . Yes No NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells **NA** 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. (Does not apply to below grade tanks) Written confirmation or verification from the municipality; Written approval obtained from the municipality Within the area overlying a subsurface mine. (Does not apply to below grade tanks) Yes No Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Yes No Society; Topographic map Within a 100-year floodplain. (Does not apply to below grade tanks) Yes No FEMA map **Below Grade Tanks** Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). Yes X No Topographic map; Visual inspection (certification) of the proposed site Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. Yes X No NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter) 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.) Yes No

Topographic map; Visual inspection (certification) of the proposed site

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 								
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 								
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 NI Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doct attached. X 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 X Design Plan - based upon the appropriate requirements of 19.15.17.10 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. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number: 	uments are							
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 docu attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.13 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC								
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:								

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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 attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC	e documents are					
 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 19.15.17.11 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 Oil Field Waste Stream Characterization 						
 Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC 						
13. Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	Fluid Management Pit					
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC						
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sou provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. If 19.15.17.10 NMAC for guidance.	rce material are Please refer to					
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 □ 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. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells □ NA						
Vithin 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa ke (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site						
 Vithin 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 						
 /ithin 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence Yes No NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site 						
/ritten confirmation or verification from the municipality; Written approval obtained from the municipality						
Vithin 300 feet of a wetland. S Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site						
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No					
Form C-144 Oil Concernation Division						

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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
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS: NM Geological 	
Within a 100-year floodplain.	Yes No
- FEMA map	Yes No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plant 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. 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 canned 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 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Stite 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 belied Name (Print): Steven Moskal Title: Field Environmental Coordination	
Signature: Date: Date: 04/02/2019	
e-mail address: <u>Steven.Moskal@bpx.com</u> Telephone: (505) 330-9179	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) Conditions (see attachment)	/
OCD Representative Signature: Approval Date:	19
Title: <u>ENV: row mental</u> <u>Spec</u> . 8 OCD Permit Number: 16512	
^{19.} <u>Closure Report (required within 60 days of closure completion)</u> : 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting a The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not a section of the form until an approved closure plan has been obtained and the closure activities have been completed.	the closure report. complete this
20.	
Closure Method: Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loo If different from approved plan, please explain.	p systems only)
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please indition mark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure) Disposal Facility Name and Permit Number Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude Longitude NAD: [1927]	

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Oil Conservation Division

22. Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report belief. I also certify that the closure complies with all applicable closure requirements	t is true, accurate and complete to the best of my knowledge and and conditions specified in the approved closure plan.
Name (Print):	Title:
Signature:	Date:
e-mail address:	Telephone:

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SITING AND HYDRO-GEOLOGICAL REPORT HORSE CANYON COMPRESSOR

SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be well in excess of 100 feet (ft.) below ground surface (bgs). This estimation is based on information from Stone and others (1983) and depth to groundwater data obtained from water well SJ04050POD1 (attached) permitted by the New Mexico State Engineer's Office (NMOSE). Local topography and proximity to adjacent water features was also considered. There are no water wells permitted by NMOSE within 1,000 ft. from the below-grade tank (BGT) (Figure 1). A topographic map (Figure 2) demonstrates that the BGT is not within 100 feet of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland, or playa lake as measured from the ordinary high water mark. Figure 3 demonstrates that the BGT is within a wetland. Figure 4 demonstrates that the BGT is not within the mapped FEMA 100-year floodplain.

LOCAL GEOLOGY AND HYDROLOGY

Groundwater is estimated to be greater than 200 ft. based on the ground level elevation difference between the site (6,067 ft.) and water well SJ04050POD1 (6,104 ft.), which recorded depth to water at 240 ft. bgs. This particular site is located north of Crow Canyon and approximately 2 mile west from the closest main channel point of Pump Canyon. Regional topography of Pump Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The more resistant cliff-forming sandstones of the San Jose Formation cap the interbedded siltstones, shales and sandstones of the Nacimiento Formation. Accumulations of talus and eroded sands at the base of canyon walls form steep to gentle slopes that transition into flat-bottomed arroyos within the canyons. Deposits of Quaternary alluvial and aeolian sands occur prominently near the surface of Pump Canyon, especially near streams and washes.

REGIONAL GEOLOGY AND HYDROLOGY

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The San Jose Formation of Eocene age occurs in both New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado-New Mexico border and overlies the Animas Formation in the general area north of the State Line. The San Jose Formation was deposited in various fluvial-type environments. In general, the unit consists of an interbedded sequence of sandstone, siltstone, and shale. Thickness of the San Jose Formation increases from west to east. Groundwater is associated with alluvial and fluvial sandstone aquifers. The occurrence of groundwater is mainly controlled by distribution of sandstone in the formation. The reported or measured discharge from numerous water wells completed in the formation range from 0.15 to 61 gallons per minute (gpm) and with a median of 5 gpm.

Most of the wells provide water for livestock and domestic purposes. The formation is suitable for recharge from precipitation due to overlying soils being sandy, highly permeable and absorbent. Low annual precipitation, relatively high transpiration and evaporation rates and deep dissection of the formation by the San Juan River and its main tributaries all tend to reduce the effective recharge to the formation. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation of Paleocene age are between 0 and 1,000 feet deep in the majority of the basin as well (Stone et al., 1983).

REFERENCES

Circular 154—Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p



New Mexico Office of the State Engineer Wells with Well Log Information

(A CLW###### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)	(R=POD has been replaced, O=orphaned, C=the file is closed)			3=SW 4=SI	,	AD83 UTM in m	eters)			(in fe	pet)	
POD Number SJ 04050 POD1 Record Count: 1 Basin/County Se Basin: San Jua				ws Rng ON 09W	X 253540	¥ 4078667		Start Date 09/09/2013	Log File Finish Date Date 09/12/2013 09/27/2013		Depth Water Driller 240 BAILEY, MARK	License Number 1357
UTMNAD83 Radii Easting (X): 2	us Search (in met 52586.46	orthing	(Y):	4080503.6		Rad	<mark>dius:</mark> 241	4				



New Mexico Office of the State Engineer Point of Diversion Summary

Well Tag	POD Number SJ 04050 POD1	(quarters ar (quarters a Q64 Q16 1	re smalle:	st to lar Tws	s Rng	AD83 UT X 53540	M in meters) Y 4078667	•	
Driller Licens Driller Name		Driller Compa	any: B	AILEY	Y DRILLING	COMP	PANY		
Drill Start Da Log File Date Pump Type:		Drill Finish D PCW Rcv Dat Pipe Discharg	e:		/12/2013	Sour	Date: ce: nated Yield	Shallow I: 8 GPM	
Casing Size:	5.00	Depth Well:			Dept	h Water:	240 feet		
W	ater Bearing Stra	tifications: To	p Bot	tom	Description	n			
			0	60	Sandstone/Gravel/Conglomerate				
			60	100	Shale/Muds	stone/S	iltstone		
		1	00	140	0 Sandstone/Gravel/Conglomerate				
		14	40	200) Shale/Mudstone/Siltstone				
		_		240	0 Sandstone/Gravel/Conglomerate				
		24	10	260	60 Shale/Mudstone/Siltstone				
					0 Sandstone/Gravel/Conglomerate				
		36	60	380	Shale/Muds	tone/Si	Itstone		



New Mexico Office of the State Engineer Wells with Well Log Information

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 252586.46

Northing (Y): 4080503.6

Radius: 1609.3

No wells found.



New Mexico Office of the State Engineer Wells Without Well Log Information

No wells found.

Basin/County Search:

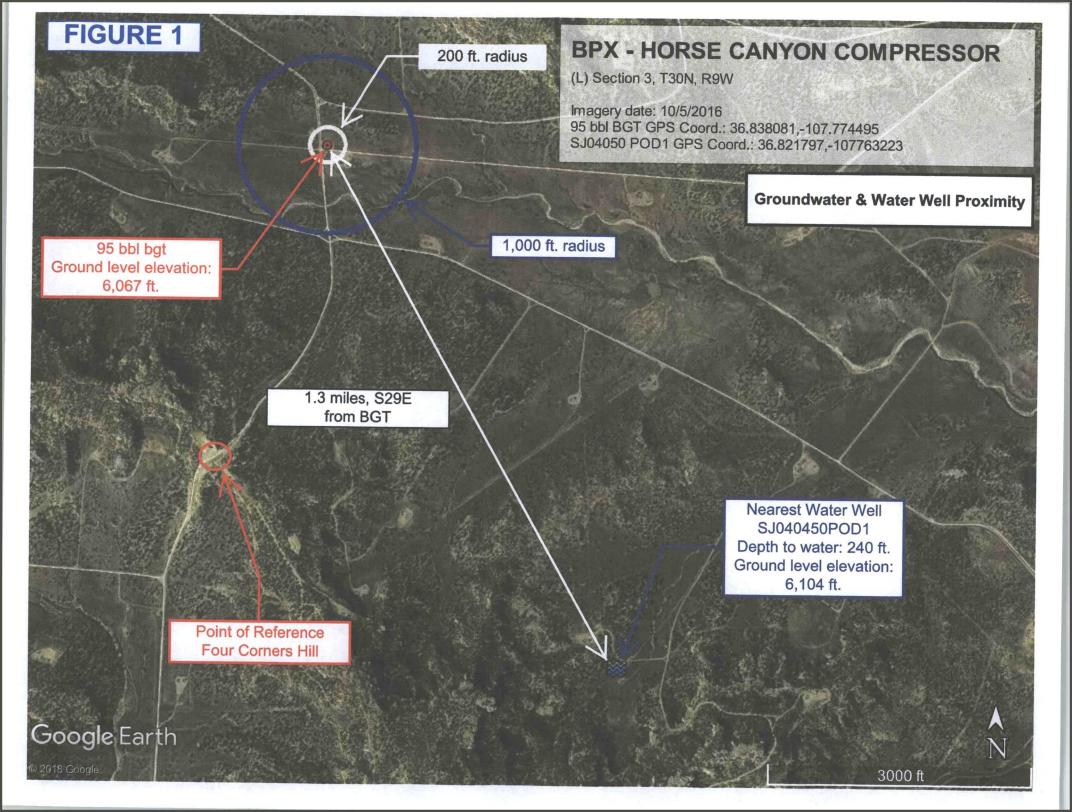
Basin: San Juan

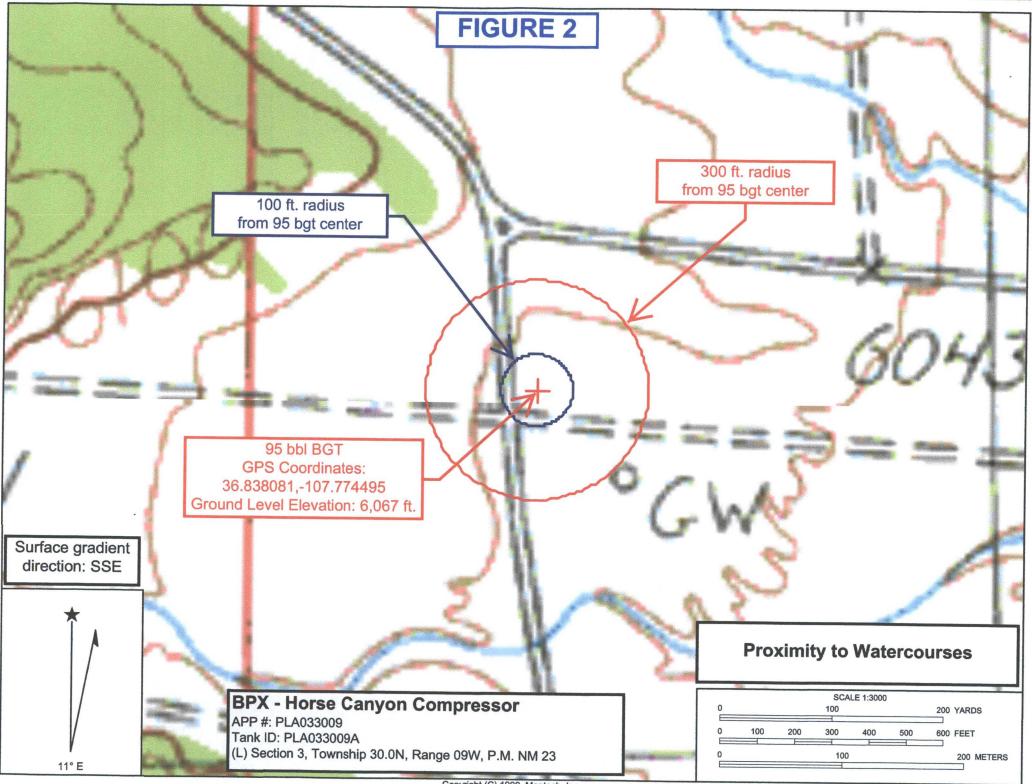
UTMNAD83 Radius Search (in meters):

Easting (X): 252586.46

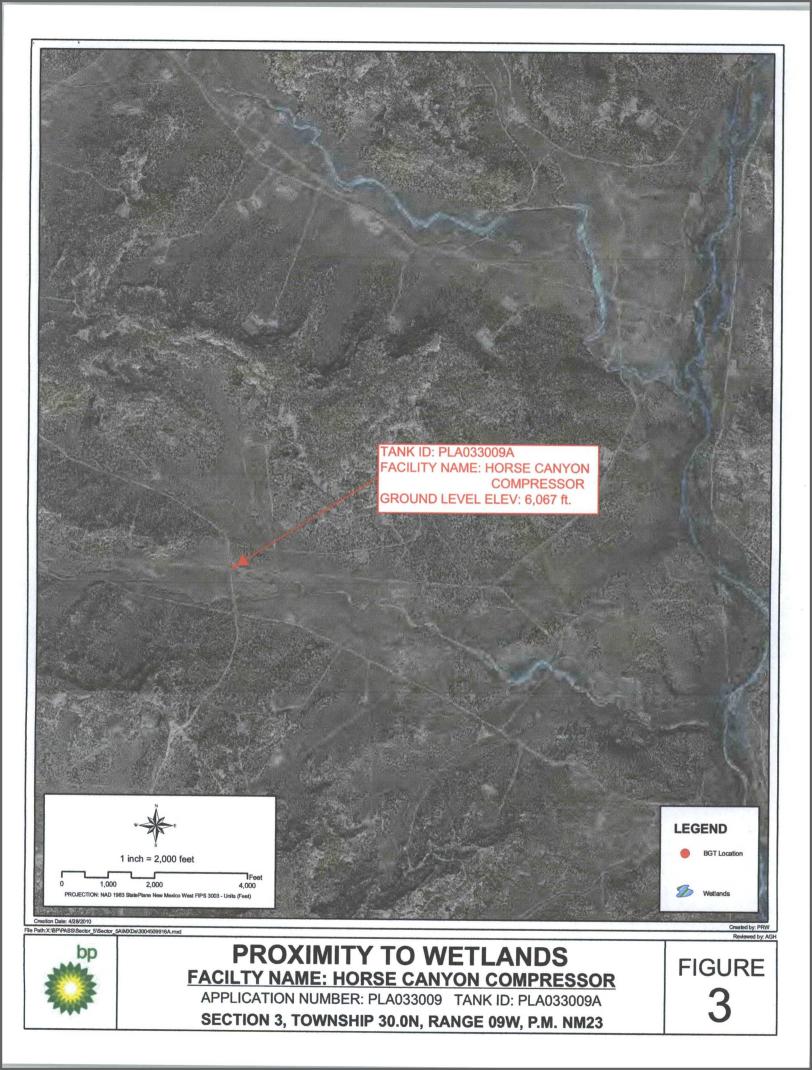
Northing (Y): 4080503.6

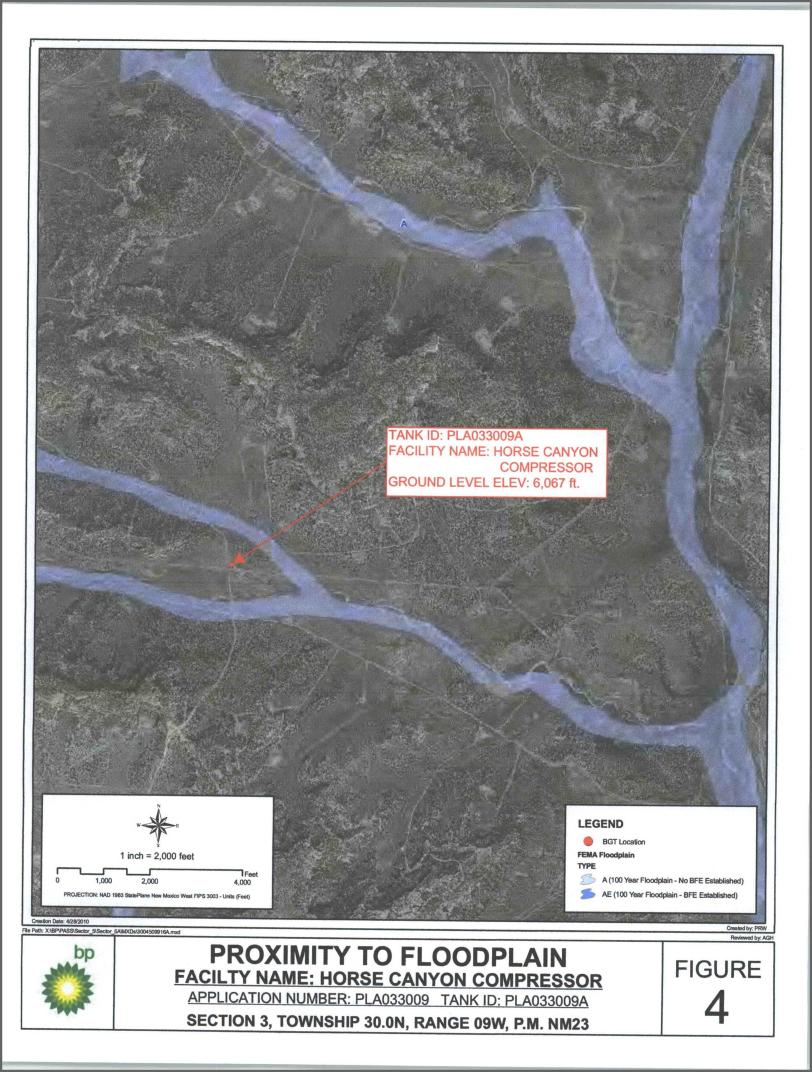
Radius: 1609.3





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BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, BP will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, BP will request preapproval from the Division District III office of any specific changes and will be included on form C-144. BP shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

General Closure Plan

- 1. BP shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
- 2. BP shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
- 3. Within 60 days of cessation of operations, BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
- 4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
- 5. Within six months of cessation of operations, BP shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
- 6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table 1 on following page).

	Ta	ble 1						
Closure Criteria for Soils Beneath Below-Grade Tanks								
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					
51 feet-100 feet	Chloride	EPA 300.0	10,000 mg/kg					
	ТРН	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					
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg					
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg					
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg					
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg					
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg					

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.

* - Or other test methods approved by the division

** - Numerical limits or natural background level, whichever is greater

- 7. If any contaminant concentration exceeds those standards set in Table I, BP will acknowledge NMOCD's position to require additional delineation upon review of the results. BP will not proceed with any further closure activities until approval is first granted by NMOCD.
- 8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then BP shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
- 9. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT 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) of Subsection H of 19.15.17.13 NMAC.
- 10. BP may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOCD's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. BP will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOCD for its approval.
- 11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.

- 12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.
- 13. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
- 14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
- 15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
- 16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at 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.
- 17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of BP subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
- 18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, BP shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
- 19. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. necessary attachments to document all closure activities
 - b. sampling results
 - c. information required by 19.15.17 NMAC
 - d. details on back-filling, capping and covering, where applicable.
- 20. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

SOUTHERN SAN JUAN BASIN (SSJB) Figure Citation List March 2019

Figure 1: Groundwater Less Than 50 ft.

Layers: Aerial Imagery: Google Earth Pro (10/5/2016)

Evaluation completed by Blagg Engineering, Inc., Bloomfield, NM. (2019)

Figure 2: Proximity to Significant Watercourses

Layers: Topographic Imagery: USGS (1999)

USGS 24k Topographic map series. 1:24000. Maps are seamless, scanned images of USGS paper topographic maps. Data created using Terrain Navigator, Copyright 1999, Maptech Inc.

Figure 3: Proximity to Wetlands

Layers: Wetlands: NWI (2010) National Wetlands Inventory (NWI). U.S Fish and Wildlife Service. (Data last updated: 09/25/2009. Data received: 03/21/2010). Data available from: http://www.fws.gov/wetlands/.

Aerial Imagery: Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 4: Proximity to Floodplains

Layers: FEMA Floodplain: FEMA (varying years) Data digitized and rectified by Wright Water Engineers, Inc. (Data digitized: August 2008). Digitized from hard copy Flood Insurance Rate Maps (FIRMs) (varying years) of San Juan County.

Aerial Imagery: Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.