<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III

1000 Rio Brazos Road, Aztec, NM 87410

District IV

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

#### State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-144 Revised June 6, 2013

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

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

12821
45-2674

## Pit Below-Grade Tank or

**RECEIVED** 

15021		Pit, Below-Grad		By OCD at 2:06 pm, Mar 25, 2015
45-26740	Propo	sed Alternative Method Permi	it or Closure Plan Appl	lication
	Type of action: or proposed alter	☐ Below grade tank registration ☐ Permit of a pit or proposed alternativ ☐ Closure of a pit, below-grade tank, o ☐ Modification to an existing permit/or ☐ Closure plan only submitted for an ernative method	r proposed alternative method registration	ted pit, below-grade tank,
	Instructions: Plea	ase submit one application (Form C-144) per	individual pit, below-grade tank o	r alternative request
environment. Nor	hat approval of this re does approval relieve	equest does not relieve the operator of liability she the operator of its responsibility to comply with	ould operations result in pollution of any other applicable governmental au	surface water, ground water or the thority's rules, regulations or ordinances.
ı. Operator: Burl	ington Resources		OGRID #: <u>217817</u>	
Address: PO	BOX 4289, Farming	gton, NM 87499		
Facility or well i	name: State Union	Com 1A		
API Number: 30	)-045-26740	OCD Permit Number:		
		16 Township 28N Range 09W		
Center of Propos	sed Design: Latitude	e <u>36.66636</u> • <u>N</u> Longitude <u>-107.78925</u>	<u>W</u> NAD: □1927 ⊠ 1983	
Surface Owner:	☐ Federal ⊠ State	Private Tribal Trust or Indian Allotmer	nt	
Temporary:  Permanent  Lined U String-Reinf	Inlined Liner type:	Cla	PVC Other	Drilling Fluid ☐ yes ☐ no
3,				
⊠ Below-grade  Volume:  Tank Construction	on material:	n I of 19.15.17.11 NMAC bbl Type of fluid: <u>Produced Water</u> Metal uk detection	separate C-141 under	. Please submit a 19.15.29 NMAC
		Visible sidewalls only   Other		
Liner type: Thi	ckness 45	mil ☐ HDPE ☐ PVC ☒ Ot	her <u>LLDPE</u>	
4.  Alternative Submittal of an		required. Exceptions must be submitted to th	e Santa Fe Environmental Bureau o	office for consideration of approval.
☐ Chain link, sinstitution or ch	six feet in height, two	1.11 NMAC (Applies to permanent pits, tempor o strands of barbed wire at top (Required if loc barbed wire evenly spaced between one and for	ated within 1000 feet of a permane	nt residence, school, hospital,

☐ Alternate. Please specify

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)  Screen Netting Other	
Monthly inspections (If netting or screening is not physically feasible)	
5igns: 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.	
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 accepmaterial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable 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 ☑ NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks)  - 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	
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
<ul> <li>application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  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
<ul> <li>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	☐ 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
<ul> <li>Within 500 feet of a wetland.</li> <li>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natural Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached.  Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 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:	O NMAC 15.17.9 NMAC
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 do 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 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:	0.15.17.9 NMAC
Transacti Triprova Sesign (unuan cep) or ususign)	

12.	
<u>Permanent Pits Permit Application Checklist</u> : 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
	documents are
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 Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	luid Management Pit
14. Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be	attacked to the
closure plan. Please indicate, by a check mark in the box, that the documents are attached.  ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 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 - 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	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Witten communition of vermous from the manner party; white approved to the state of	☐ 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.	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 plan 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 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:  It is a subject to the least of my knowledge and half	iof
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and believe to the best of my knowled	
Name (Print): Title:	-
Signature: Date:	
e-mail address:Telephone:	
18.  OCD Approval: ☐ Permit Application (including closure plan) ☑ Closure Plan (only) ☑ OCD Conditions (see attachment) Se	e front page
OCD Representative Signature: Approval Date:	Apr 24, 2015
and 1	
Title: Environmental Specialst OCD Permit Number:	
Title: Environmental Specialst  OCD Permit Number:  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.  Closure Completion Date: 10/7/2010	g the closure report. t complete this
Title: Environmental Specialst  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.	t complete this

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.

Signature: Date: 3/20/2015

Staff Regulatory Technician

e-mail address: Denise.Journey@conocophillips.com Telephone: (505) 326-9556

Name (Print): Denise Journey Title:

# Burlington Resources Oil Gas Company, LP San Juan Basin Below Grade Tank Closure Report (Without Reclamation)

**Lease Name: State Union Com 1A** 

API No.: 30-045-26740

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

#### General Plan:

- 1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
- 2. The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.
- 3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.
  - All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.
- 4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

- 5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.
  - All on-site equipment associated with the below-grade tank was removed.
- 6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached).

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

#### Constituents exceeded testing limits.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
  - i. Operator's name

notification.

ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is missing due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner not found. COPC was not aware that the original notification sent at the time of Permitting was not the only closure notification required.

ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area will be re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping, including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved

methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. 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. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 will be accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
  - Soil Backfilling and Cover Installation (See Report)
  - Re-vegetation application rates and seeding techniques (See Report)
  - Photo documentation of the site reclamation (Included as an attachment)
  - Confirmation Sampling Results (Included as an attachment)
  - Proof of closure notice (Included as an attachment)

Closure Documentation was not submitted within the 60 day requirement due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to ensure closure documentation is submitted with the 60 day time frame.

3/23/2015



November 8, 2010

Project No. 92115-1457

Ms. Kelsi Harrington ConocoPhillips 3401 East 30<sup>th</sup> Street Farmington, New Mexico 87401

Phone: (505) 599-3403

RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE STATE UNICON COM UNIT 1A (HBR) WELL SITE, SAN JUAN COUNTY, NEW MEXICO

Dear Ms. Harrington,

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the State Unicon Com Unit 1A (hBr) well site located in Section 16, Township 28 North, Range 9 West, San Juan County, New Mexico. The BGT was removed prior to Envirotech personnel's arrival on October 7, 2010. One (1) five (5)-point composite sample was collected from beneath the former BGT. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, for organic vapors using a photoionization detector (PID) and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for TPH using USEPA Method 8015, for benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample returned results below the regulatory standards for chlorides but above the regulatory standard of 100 parts per million (ppm) TPH using USEPA Method 418.1, confirming a release did occur.

A brief site assessment was conducted and the regulatory standards were determined to be 5000 ppm TPH and 100 ppm organic vapors due to horizontal distance to surface water being greater than 1000 feet and depth to groundwater being greater than 100 feet, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standards for benzene and BTEX using USEPA Method 8021 and TPH using USEPA Method 8015; see attached *Analytical Results*. Envirotech, Inc. recommends no further action in regards to this incident.

ConocoPhillips State Unicon Com Unit 1A (hBr) BGT Closure Sampling Project No. 92115-1457 Page 2

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully submitted, Envirotech, Inc.

Scott Gonzales

Senior Environmental Technician sgonzales@envirotech-inc.com

Enclosures: Analytical Results

Field Notes

Cc: Client File 92115

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TEMPORARY PIT - GR	ROUNDWA'	TER 50-100 F	EET DEEP			(445.4) . 5.50		ORIDES < 5004
BENZENE ≤ 0.2 mg/kg, BT	EX ≤ 50 mg/k	g, GRO & DRO	) FRACTION	N (8015) ≤ 50	JU mg/kg, TPH (	(418.1) ≤ 2500	mg/kg, CHI	JULIUS ≥ 500 mg/kg
TEMPORARY PIT - GF					a a more	440 41 - 0800	a . CTT	ODIDEG < 1000
BENZENE ≤ 0.2 mg/kg, BTI	3X ≤ 50 mg/kį	z, GRO & DRO	FRACTION	N (8015) ≤ 50	0 mg/kg, TPH (	418.1) ≤ 2500	mg/kg, CHL	OKIDES Z 1000 mg/kg
PERMANENT PIT OR								•
BENZENE ≤ 0.2 mg/kg, B	TEX ≤ 50 mg	/kg, TPH (418.	1) ≤ 100 mg/l	kg, CHLORI	DES ≤ 250 mg/l	kg		
		la i s en en en en	* + B > 10		D 418.1 ANAL		DEADDIG	CALC. (mg/kg)
	I THEAT	ISAMPLE LD.	LAB NO.	MEIGHI (g	mL FREON	DILUTION	KEADING	CALC. (IUg/kg)
!	TIME			-		-		-
	11:00 11:25	200 STD 5st. Cons	1	5	20	- -	153	412 ppn
	11:00	200 STD	1 2	5	20	-	206	412 ppn
	11:00	200 STD	1	5	20	-	206	412 ppn
	11:00	200 STD	1 2 3 4 5	5	20	-	206	412 ppm
	11:00	200 STD	1 2 3 4	5	20	-	206	412 ppm
PERIMI	11:00	200 STD	1 2 3 4 5 6	S	Z o	-	153	412 pp n
PERIME	11:00 11:25	200 STD	1 2 3 4 5 6 FIELD C	S S HLORIDE	S RESULTS	-	153	
	11:00 11:25	200 STD	1 2 3 4 5 6	S	S RESULTS  CALC. (me/kg)	-	153	
PERIME	11:00 11:25	200 STD	1 2 3 4 5 6 FIELD C	S S HLORIDE READING	S RESULTS	-	153	
⊗	11:00 11:25	200 STD	1 2 3 4 5 6 FIELD C	S S HLORIDE READING	S RESULTS  CALC. (me/kg)	-	153	
⊗	11:00 11:25	200 STD	1 2 3 4 5 6 FIELD C	S S HLORIDE READING	S RESULTS  CALC. (me/kg)	-	153	
	11:00 11:25	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	S S HLORIDE READING	S RESULTS  CALC. (me/kg)	-	153	
⊗	11:00 11:25	200 STD	1 2 3 4 5 6 FIELD C	S HLORIDE READING 2.2	S RESULTS  CALC. (mg/kg)  42 ppm	-	204 153 PRO	OFILE
⊗	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	S HLORIDE READING Z.Z PID RESU	S RESULTS  CALC. (mg/kg)  42 ppm	y	204 153 PRO	
⊗	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	-	204 153 PRO	OFILE
N<	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  C2 ppm  LTS  RESULTS	y	204 153 PRO	OFILE
⊗	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
N (	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
N (	11:00 11:25 ETER	200 STD Spt. Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
N N NH	11:00 11:25 ETER	Ast Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
LAB SAMPLES SAMPLE ID ANALYSIS	11:00 11:25 ETER	Ast Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
N N NH	11:00 11:25 ETER	Ast Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
LAB SAMPLES SAMPLE ID ANALYSIS BENZENE BTEX GRO & DRO	II:00 II:25 II:25 STER	Ast Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE
LAB SAMPLES SAMPLE ID ANALYSIS BENZENE BTEX	II:00 II:25 II:25 STER	Ast Cony	1 2 3 4 5 6 FIELD C	HLORIDE READING Z.Z PID RESUIPLE ID	S RESULTS  CALC. (mg/kg)  (2 ppm  LTS  RESULTS (mg/kg)	y	204 153 PRO	OFILE

Client:	i i i	(		<b>NVIFO</b> 5) 632-0615 (8 8. Hwy 64, Farm		9	Location No	):		
LOCATION: NAME: 54	SURE VERIFICATION					PAGE NO: OF \ DATE STARTED: (0-7-10 DATE FINISHED: (0-7-10				
QUAD/UNIT: A	SEC: 16 NL 112	TWP: 28 N 1	RNG:9W CONTRAC	PM:NuPm TOR:	CNTY:SJ:	ST: NM		environmental specialist: 5G		
EXCAVATION APPROX: DISPOSAL FACILITY: LAND USE:		FT. X	LEASE: A	FT. X REMEDIATION PI~ 300 95	ON METHO	LAND OW	NER: 5ta	+4		
CAUSE OF RELEASE: 7 G SPILL LOCATED APPROXI DEPTH TO GROUNDWATE	MATELY:	NEAREST W	FT. / <i>9</i> VATER SO	0 ° URCE: 710.	FROM we/	NEAREST	SURFACE	: Jonta   0:   WATER: 7 1000'		
NMOCD RANKING SCORE SOIL AND EXCAVATION E			NMOCD T	PH CLOSURI	ESTD: 5 <u>0</u> .	00	PPM			
SAMPLE DESCRIPITION Zoo 5+J	TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING 206	CALC. ppm		
Spt Comp	11:25	Spl. Comp		5	20	Ч	153	(012		
SPILL PER	IMETER		`	OVM RESULTS			SPILL I	PROFILE		
MH MH	BAT	(A ST)	SAMPLE ID Spl. Comp	FIELD HEAD	m)					
TRAVEL NOTES:	CALLED C	OUT:			ONSITE:					



### EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:

ConocoPhillips

Project #:

92115-1457

Sample No.:

1

Date Reported:

10/13/2010

Sample ID:

5 Pt. Composite

d. 10/13

Sample Matrix:

Soil

Date Sampled: Date Analyzed: 10/7/2010

Preservative:

Cool

Analysis Needed:

TPH-418.1

Condition:

Cool and Intact

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

**Total Petroleum Hydrocarbons** 

612

5.0

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis

of Water and Waste, USEPA Storet No. 4551, 1978.

Comments:

State Unicon Com Unit 1A (hBr)

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Scott Gonzales

Printed

Review

Sarah Rowland, EIT

Printed



# CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Cal	Do	to:

7-Oct-10

Parameter	Standard Concentration mg/L	Concentration Reading mg/L	
TPH	100		
	200	206	
	500		
	1000		

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

211 (2)	10/13/2010
Analyst	Date
Scott Gonzales	
Print Name	
Sah Rall	10/13/2010
Review	Date

Sarah Rowland, EIT

Print Name



#### Field Chloride

Client:

ConocoPhillips

Project #:

92115-1457

Sample No.:

Date Reported:

10/13/2010

Sample ID:

5 Pt. Composite Soil

Date Sampled:

10/7/2010

Sample Matrix:

Date Analyzed:

10/7/2010

Preservative:

Cool

Analysis Needed:

Chloride

Condition:

Cool and Intact

Parameter	(mg/kg)	(mg/kg)
	Concentration	Limit
		Det.

**Field Chloride** 

62

33.0

ND = Parameter not detected at the stated detection limit.

References:

"Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992

Hach Company Quantab Titrators for Chloride

Comments:

State Unicon Com Unit 1A

Scott Gonzales

Printed

Sarah Rowland, EIT



## EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client: ConocoPhillips Project #: 921	115-1457
Sample ID: 5 Pt Comp Date Reported: 10-	08-10
Laboratory Number: 56112 Date Sampled: 10-	07-10
Chain of Custody No: 10495 Date Received: 10-4	07-10
Sample Matrix: Soil Date Extracted: 10-0	08-10
Preservative: Cool Date Analyzed: 10-	-08-10
Condition: Intact Analysis Requested: 801	5 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	

ND - Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments:

State Unicon Com #1A

Analyst

Review

Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 lab@envirotech-inc.com envirotech-inc.com



### EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

#### **Quality Assurance Report**

Client: QA/QC Project #: N/A 10-08-10 10-08-10 QA/QC Date Reported: Sample ID: N/A Date Sampled: Laboratory Number: 56111 Date Received: N/A Sample Matrix: Methylene Chloride Preservative: N/A Date Analyzed: 10-08-10 TPH Condition: N/A Analysis Requested:

Accept. Range I-Cal RF: C-Cal RF: % Difference I-Cal Date 9.9960E+002 1.0000E+003 0.04% 0 - 15% Gasoline Range C5 - C10 10-08-10 0 - 15% Diesel Range C10 - C28 10-08-10 9.9960E+002 1.0000E+003 0.04%

 Blank Conc. (mg/L - mg/Kg)
 Concentration
 Detection Limit

 Gasoline Range C5 - C10
 ND
 0.2

 Diesel Range C10 - C28
 ND
 0.1

 Duplicate Conc. (mg/Kg)
 Sample
 Duplicate
 % Difference
 Accept Range

 Gasoline Range
 C5 - C10
 ND
 ND
 0.0%
 0 - 30%

 Diesel Range
 C10 - C28
 ND
 ND
 0.0%
 0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
Gasoline Range C5 - C10	ND	250	250	100%	75 - 125%
Diesel Range C10 - C28	ND	250	259	104%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 56111-56112

Vet

Réview



# EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	ConocoPhillips	Project #:	92115-1457
Sample ID:	5 Pt Comp	Date Reported:	10-08-10
Laboratory Number:	56112	Date Sampled:	10-07-10
Chain of Custody:	10495	Date Received:	10-07-10
Sample Matrix:	Soil	Date Analyzed:	10-08-10
Preservative:	Cool	Date Extracted:	10-08-10
Condition:	Intact	Analysis Requested:	BTEX
		Difution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	1.1	0.9
Toluene	ND	1.0
Ethylbenzene	7.7	1.0
p,m-Xylene	174	1.2
o-Xylene	9.0	0.9
Total BTFX	192	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	101 %
	1,4-difluorobenzene	100 %
	Bromochlorobenzene	97.9 %

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846,

USEPA, December 1996.

Comments:

State Unicon Com #1A

Analyst

, M Review



# EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

ND

ND

ND

0.1

0.1

0.1

Client:	N/A		Project #:		N/A
Sample ID:	1008BBLK QA/Q	С	Date Reported:		10-08-10
Laboratory Number:	56111		Date Sampled:		N/A
Sample Matrix:	Soil		Date Received:		N/A
Preservative:	N/A		Date Analyzed:		10-08-10
Condition:	N/A		Analysis:		BTEX
			Dilution:		10
Calibration and	I-Cal RF:	C-Cal RF:	%Diff.	Blank	Detect.
Detection Limits (ug/L)		Accept. Ra	inge 0 - 15%	Conc	Limit
Benzene	4.3621E+005	4.3708E+005	0.2%	ND	0.1
Toluene	5.2582E+005	5.2687E+005	0.2%	ND	0.1

4.6748E+005

1.1112E+006

4.1962E+005

0.2%

0.2%

0.2%

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect: Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	ND	ND	0.0%	0 - 30%	1.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	ND	ND	0.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample.	% Recovery	Accept Range
Benzene	ND	500	497	99.3%	39 - 150
Toluene	ND	500	493	98.6%	46 - 148
Ethylbenzene	ND	500	503	101%	32 - 160
p,m-Xylene	ND	1000	1,010	101%	46 - 148
o-Xylene	ND	500	504	101%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

4.6654E+005

1.1090E+006

4.1878E+005

References:

Ethylbenzene

p,m-Xylene

o-Xylene

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996.

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using

Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/

QA/QC for Samples 56111-56112

Analyst

Review



#### Chloride

Client:	ConocoPhillips	Project #:	92115-1457
Sample ID:	5 Pt Comp	Date Reported:	10-08-10
Lab ID#:	56112	Date Sampled:	10-07-10
Sample Matrix:	Soil	Date Received:	10-07-10
Preservative:	Cool	Date Analyzed:	10-08-10
Condition:	Intact	Chain of Custody:	10495

**Parameter** 

Concentration (mg/Kg)

**Total Chloride** 

55

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments:

State Unicon Com #1A

Analyst

Review

RusH

CHAIN OF CUSTODY RECORD

10495

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Cllent:		Project Name / Location:	ocation:	Ŧ						•	ANALY	I/SIS	ARAM	ANALYSIS / PARAMETERS	60			
Conaco Millips		State WienCon	ical	#/# no	4		1							1				
Client Address:	·	Sampler Name:	Ü							<del></del>		d		<u> </u>				
Client Phone No.:		Client No.: 92115-1457	145	7			Method	(Method	bortieM steM 8	noinA \		I/H diw	(1 017	418.1) HIDE			le Cool	le Intact
Sample No./ Sample Identification Date	Samp	e Lab No.	S X		No./Volume of Containers	No./Volume Preservative of HQ, HC   KC	I) H9T				HCI		PAH .	СНГО			ume2	
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District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

# Release Notification and Corrective Action

OPERATOR									
Name of Co Owned Su	heidiary	of Conoco	Phillips (	es, a Wholly Company	Contact	Contact Kelsi Harrington			
Address	3401	E. 30 <sup>th</sup> St.	Farming	ton, NM 8740	72 Telephone	Telephone No. 505-599-3403			
Facility Nan		te Unicon	Com 1A		Facility Ty	oe .	Gas Well	API# 3004526740	
Surface Ow				Mineral Ov	vner State				
LOCATION OF RELEASE									
Unit Letter	Section 16	Township 28N	Range <b>09W</b>	Feet from the 1028'	North/South Line		East/West Li	San Juan	
Latitude 36.66638° N Longitude -107.78842° W									
NATURE OF RELEASE									
Type of Rele	ase – Unk	nown				Release – Unknov	wn	Volume Recovered –	
Source of Re	lease: Be	low Grade	Tank		Date and Ho Unknowr	our of Occurrence		Date and Hour of Discovery <b>10/7/10</b>	
Was Immediate Notice Given?  ☐ Yes ☐ No ☒ Not Required  If YES, To Whom?									
By Whom?						our –			
Was a Watercourse Reached?  ☐ Yes ☒ No  ☐ If YES, Volume Impacting the Watercourse.									
If a Watercourse was Impacted, Describe Fully.*									
	Describe Cause of Problem and Remedial Action Taken.* Below grade tank closure activities.								
D '1 A	B. I. A. Afforded and Cleanup Action Taken * The below grade tank sample results were above the regulatory standard by								
LICEDA mathod 449 4 for TDU and Organic Vanors, confirming a release. The sample was their transported to the lab									
and analytical results were below the regulatory standards set forth in the Ninoco Guidelines for Remediation of									
Looks Spills and Polesses: therefore no further action is required.									
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 regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger									
The acceptance of a C-141 report by the NM()(1) marked as "Final Report" does not refleve the operator of natural									
1 11 4 six an artistic and follow to adequately investigate and remediate confamination that to glow water, surface water, named neutrinostic and the second									
or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compilance with any other									
federal, state, or local laws and/or regulations.									
Signature:  OIL CONSERVATION DIVISION									
Printed Name: Kelsi Harrington Approved by District Supervisor:									
Title:	En	vironment	al Consu	ltant	Approval I	Date:	Expira	tion Date:	
E-mail Add	ress: <b>kelsi</b>	.g.harringt	on@cond	ocophillips.co	Conditions	of Approval:		Attached	
Date: 11/3/10 Phone: 505-599-3403									



<sup>\*</sup> Attach Additional Sheets If Necessary