

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 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.

12909  
45-29903

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

RECEIVED BY OCD  
3/12/2015

- 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.

1.  
Operator: Burlington Resources OGRID #: 14538  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: Kessler Com 3A  
API Number: 3004529903 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr A (NENE) Section 25 Township 30N Range 11W County: San Juan  
Center of Proposed Design: Latitude 36.78726000 °N Longitude -107.93684000 °W NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

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 \_\_\_\_\_

Closed Prior to Closure Plan Approval

3.  
 **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Metal  
 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: Thickness 45 mil  HDPE  PVC  Other LLDPE

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.

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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 \_\_\_\_\_

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

8.  
**Variations 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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

<b>General siting</b>	
<b>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</b> - <input type="checkbox"/> NM Office of the State Engineer - iWATERS database search; <input type="checkbox"/> USGS; <input checked="" type="checkbox"/> Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<b>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</b> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. <b>(Does not apply to below grade tanks)</b> - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. <b>(Does not apply to below grade tanks)</b> - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Below Grade Tanks</b>	
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Temporary Pit using Low Chloride Drilling Fluid</b> (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	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Temporary Pit Non-low chloride drilling fluid</u></b></p>	
<p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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;</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b></p>	
<p>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).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.  
**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Hydrogeologic Report (Below-grade 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 19.15.17.9 NMAC and 19.15.17.13 NMAC

Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

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 documents are 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 19.15.17.9 NMAC 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: \_\_\_\_\_

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 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
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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  Below-grade Tank  Multi-well Fluid Management Pit  
 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

14. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection 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. **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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

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 19.15.17.11 NMAC

Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC

Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC

Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 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 be achieved)

Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 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 belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18. **OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)

**OCD Representative Signature:**  \_\_\_\_\_ **Approval Date:** \_\_\_\_\_ Jun 09, 2015

**Title:** Environmental Specialist **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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

**Closure Completion Date:** 1/13/11

20. **Closure Method:**

Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)

If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check 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

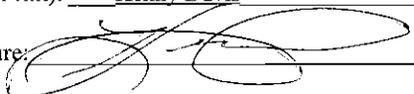
Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD:  1927  1983

**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): Kenny Davis Title: Staff Regulatory Technician

Signature:  Date: 12/3/14

e-mail address: kenny.r.davis@conocophillips.com Telephone: 505-599-4045

**Burlington Resources Oil Gas Company, LP**  
**San Juan Basin**  
**Below Grade Tank Closure Report**

**Lease Name: Kessler Com 3A**

**API No.: 3004529903**

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 or is not included in Paragraph (5) 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.

12/8/2014

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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.

**A release was not determined for the above referenced well.**

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
  - 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 notification.**

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 was 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 be 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 an 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 was 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.**



March 1, 2011

Project Number 92115-1558

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

Phone: (505) 599-3403

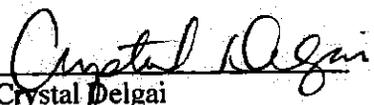
**RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE KESSLER COM 3A (hBR) WELL SITE, SAN JUAN COUNTY, NEW MEXICO**

Dear Ms. Harrington,

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the Kessler Com 3A (hBr) well site located in Section 25, Township 30 North, Range 11 West, San Juan County, New Mexico. Upon Envirotech personnel's arrival on January 13, 2011, one (1) five (5) point composite sample was collected from beneath the former BGT. The sample collected was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, and screened in the field for organic vapors using a photoionization detector (PID) and chlorides. The sample returned results below the regulatory standards for TPH and organic vapors but above the regulatory standards for chlorides; see attached *Field Sheet*. A background sample was collected to determine the naturally occurring chloride content of the soil. The sample collected from under BGT 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 benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample collected from the background was also 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 total chlorides using USEPA Method 4500. The composite sample taken from beneath the BGT returned results below the regulatory standards for all constituents analyzed with the exception of chloride which was more than 250 ppm over the background chlorides confirming a release had occurred; see attached *Analytical Results*. Envirotech Inc. recommends following the direction of the NMOCD to remediate this spill.

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.**

  
Crystal Delgai  
Environmental Field Technician  
[CDelgai@envirotech-inc.com](mailto:CDelgai@envirotech-inc.com)

Enclosures: Analytical Results  
Field Notes

Cc: Client File 92115

PAGE NO: 1 OF 1

**ENVIROTECH INC**

ENVIRONMENTAL SCIENTISTS & ENGINEERS  
 5796 U.S. HIGHWAY 64 - 3014  
 FARMINGTON, NEW MEXICO 87401  
 PHONE: (505) 632-0615

ENVIRONMENTAL SPECIALIST: CD/EG  
 LAT: 36-78724306  
 LONG: -107.9313325

DATE STARTED: 1-13-11  
 DATE FINISHED: 1-13-11

**FIELD REPORT: BGT / PIT CLOSURE VERIFICATION**

LOCATION: NAME: Kessler Com 3A WELL #: 3A TEMP PIT: PERMANENT PIT: BGT:   
 LEGAL ADD: UNIT: A SEC: 25 TWP: 30N RNG: 11W PM:  
 QTR/FOOTAGE: 1025' E 1010' N CNTY: San Juan ST: NM

EXCAVATION APPROX: 18 FT. X 19 FT. X 3 FT. DEEP CUBIC YARDAGE:

DISPOSAL FACILITY: REMEDATION METHOD:  
 LAND OWNER: Federal API: 300-452-9903 BGT / PIT VOLUME:  
 CONSTRUCTION MATERIAL: DOUBLE-WALLED, WITH LEAK DETECTION:

LOCATION APPROXIMATELY: 57 FT. West FROM WELLHEAD

DEPTH TO GROUNDWATER: > 100'

TEMPORARY PIT - GROUNDWATER 50-100 FEET DEEP

BENZENE  $\leq$  0.2 mg/kg, BTEX  $\leq$  50 mg/kg, GRO & DRO FRACTION (8015)  $\leq$  500 mg/kg, TPH (418.1)  $\leq$  2500 mg/kg, CHLORIDES  $\leq$  500 mg/kg

TEMPORARY PIT - GROUNDWATER  $\geq$  100 FEET DEEP

BENZENE  $\leq$  0.2 mg/kg, BTEX  $\leq$  50 mg/kg, GRO & DRO FRACTION (8015)  $\leq$  500 mg/kg, TPH (418.1)  $\leq$  2500 mg/kg, CHLORIDES  $\leq$  1000 mg/kg

PERMANENT PIT OR BGT

BENZENE  $\leq$  0.2 mg/kg, BTEX  $\leq$  50 mg/kg, TPH (418.1)  $\leq$  100 mg/kg, CHLORIDES  $\leq$  250 mg/kg

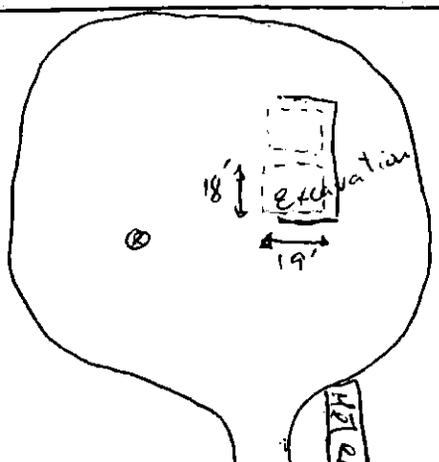
FIELD 418.1 ANALYSIS

TIME	SAMPLE ID	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. (mg/kg)
10:40	200 STD					177	
10:45	BGT	1				13	52
		2					
		3					
		4					
		5					
		6					

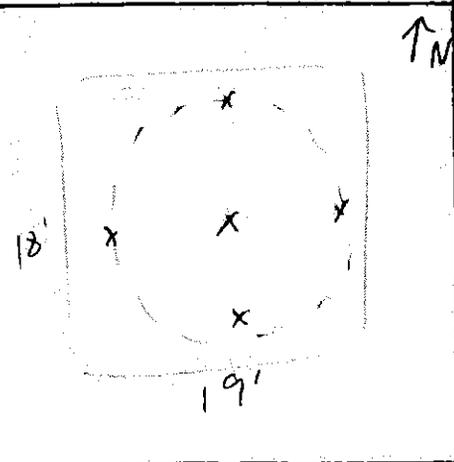
PERIMETER

FIELD CHLORIDES RESULTS

PROFILE



SAMPLE ID	READING	CALC. (mg/kg)
1	6.0	2200



PID RESULTS

SAMPLE ID	RESULTS (mg/kg)
1	61

LAB SAMPLES

SAMPLE ID	ANALYSE	RESULTS
	BENZENE	
	BTEX	
	GRO & DRO	
	CHLORIDES	

NOTES: 6.01 on site @

WORKORDER #

WHO ORDERED



EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Client: ConocoPhillips Project #: 92115-1558  
Sample No.: 1 Date Reported: 2/14/2011  
Sample ID: BGT Sample Date Sampled: 1/13/2011  
Sample Matrix: Soil Date Analyzed: 1/13/2011  
Preservative: Cool Analysis Needed: TPH-418.1  
Condition: Cool and Intact

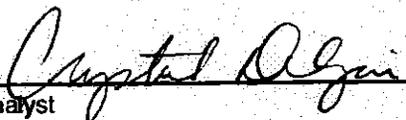
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	52	5.0

ND = Parameter not detected at the stated detection limit.

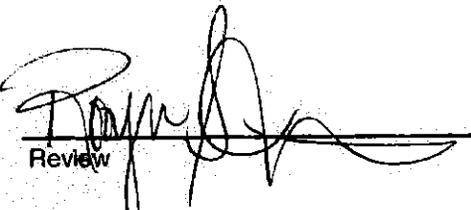
References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Kessler Com 3A (hBr)

Instrument calibrated to 200 ppm standard. Zeroed before each sample

  
\_\_\_\_\_  
Analyst

Crystal Delgai,  
\_\_\_\_\_  
Printed

  
\_\_\_\_\_  
Review

Robyn Jones  
\_\_\_\_\_  
Printed



Field Chloride

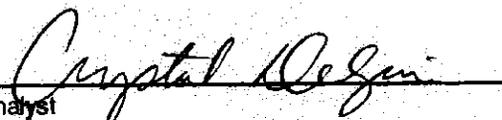
Client: ConocoPhillips Project #: 92115-1558  
Sample No.: 1 Date Reported: 2/14/2011  
Sample ID: BGT Sample Date Sampled: 1/13/2011  
Sample Matrix: Soil Date Analyzed: 1/13/2011  
Preservative: Cool Analysis Needed: Chloride  
Condition: Cool and Intact

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Field Chloride	2,200	33.0

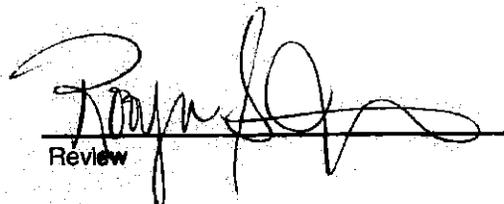
ND = Parameter not detected at the stated detection limit.

References: "Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992  
Hach Company Quantab Titrators for Chloride

Comments: Kessler Com 3A (hBr)

  
Analyst

Crystal Delgai  
Printed

  
Review

Robyn Jones  
Printed



CONTINUOUS CALIBRATION  
EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Cal. Date: 13-Jan-11

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	177
	200	
	500	
	1000	

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

Crystal Delgai  
Analyst

2/21/2011  
Date

Crystal Delgai  
Print Name

[Signature]  
Review

2/21/2011  
Date

Robyn Jones  
Print Name



EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS

Client:	ConocoPhillips	Project #:	92115-1558
Sample ID:	BGT	Date Reported:	01-14-11
Laboratory Number:	57005	Date Sampled:	01-13-11
Chain of Custody:	11015	Date Received:	01-13-11
Sample Matrix:	Soil	Date Analyzed:	01-13-11
Preservative:	Cool	Date Extracted:	01-13-11
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	ND	1.0
Ethylbenzene	ND	1.0
p,m-Xylene	ND	1.2
o-Xylene	ND	0.9
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	113 %
	1,4-difluorobenzene	115 %
	Bromochlorobenzene	98.4 %

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: Kessler Com 3A

  
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Analyst

  
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Review



**EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS**

Client:	N/A	Project #:	N/A
Sample ID:	0113BCA2 QA/QC	Date Reported:	01-14-11
Laboratory Number:	57003	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	01-13-11
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF: Accept. Range 0 - 15%	%Diff.	Blank Conc	Detect Limit
Benzene	1.4261E+003	1.4290E+003	0.2%	ND	0.1
Toluene	1.0529E+003	1.0550E+003	0.2%	ND	0.1
Ethylbenzene	6.5070E+002	6.5200E+002	0.2%	ND	0.1
p,m-Xylene	1.6168E+003	1.6200E+003	0.2%	ND	0.1
o-Xylene	1.2136E+003	1.2160E+003	0.2%	ND	0.1

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

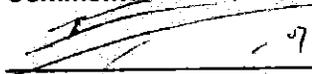
Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	439	87.8%	39 - 150
Toluene	ND	500	440	88.0%	46 - 148
Ethylbenzene	ND	500	476	95.2%	32 - 160
p,m-Xylene	ND	1000	955	95.5%	46 - 148
o-Xylene	ND	500	485	97.0%	46 - 148

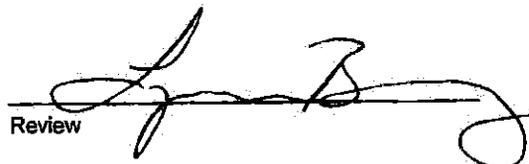
ND - Parameter not detected at the stated detection limit.

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

References: 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/QC for Samples 57003-57005

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review

Client:	ConocoPhillips	Project #:	92115-1558
Sample ID:	BGT	Date Reported:	01/14/11
Lab ID#:	57005	Date Sampled:	01/13/11
Sample Matrix:	Soil	Date Received:	01/13/11
Preservative:	Cool	Date Analyzed:	01/14/11
Condition:	Intact	Chain of Custody:	11015

Parameter	Concentration (mg/Kg)
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**Total Chloride**

**650**

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., 1995

Comments: **Kessler Com 3A**




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Analyst




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Review



**Chloride**

Client:	ConocoPhillips	Project #:	92115-1558
Sample ID:	Background	Date Reported:	01/14/11
Lab ID#:	57006	Date Sampled:	01/13/11
Sample Matrix:	Soil	Date Received:	01/13/11
Preservative:	Cool	Date Analyzed:	01/14/11
Condition:	Intact	Chain of Custody:	11015

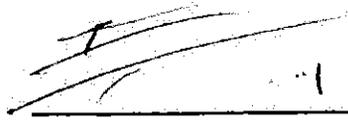
Parameter	Concentration (mg/Kg)
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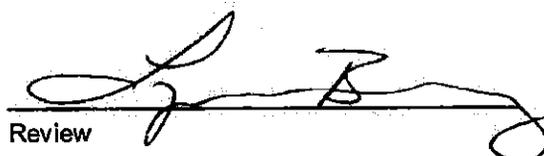
**Total Chloride**

**ND**

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., 199:

Comments: **Kessler Com 3A**

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review



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**

Initial Report  Final Report

Name of Company <b>Burlington Resources</b>	Contact <b>Kenny Davis</b>
Address <b>3401 East 30<sup>th</sup> St, Farmington, NM</b>	Telephone No. <b>(505) 599-4045</b>
Facility Name: <b>Kessler Com 3A</b>	Facility Type: <b>Gas Well</b>
Surface Owner <b>Federal</b>	Mineral Owner <b>Federal</b>
Lease No. <b>SF-078198</b>	

**LOCATION OF RELEASE**

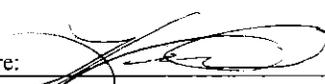
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>A</b>	<b>25</b>	<b>30N</b>	<b>11W</b>	<b>1010</b>	<b>North</b>	<b>1025</b>	<b>East</b>	<b>San Juan</b>

Latitude **36.78726000** Longitude **-107.93684000**

**NATURE OF RELEASE**

Type of Release <b>BGT Closure Summary</b>	Volume of Release <b>N/A</b>	Volume Recovered <b>N/A</b>
Source of Release: <b>NONE</b>	Date and Hour of Occurrence <b>N/A</b>	Date and Hour of Discovery <b>N/A</b>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? <b>N/A</b>	
By Whom? <b>N/A</b>	Date and Hour <b>N/A</b>	
Was a Watercourse Reached? <b>N/A</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. <b>N/A</b>	
If a Watercourse was Impacted, Describe Fully.* <b>N/A</b>		
Describe Cause of Problem and Remedial Action Taken.* <b>N/A</b>		
Describe Area Affected and Cleanup Action Taken.* <b>BGT Closure: NO RELEASE FOUND UPON REMOVAL</b>		

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.

Signature: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Kenny Davis</b>		Approved by District Supervisor:	
Title: <b>Staff Regulatory Technician</b>		Approval Date:	Expiration Date:
E-mail Address: <b>Kenny.r.davis@conocophillips.com</b>		Conditions of Approval:	
Date: <b>12/8/14</b> Phone: <b>(505) 599-4045</b>		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary







**BGT Closure Packet Check List - Well Name:** Kesslee Corn 3A  
 (S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\BGT Closure Check List)

12/8/14 (12) ✓ Below-grade Tank Closure Report from HSE  
 (S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents))

12/8/14 (12) ✓ Sampling (S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks\ZZ-BGT Closure Reports (there are two folders-Below Grade Tanks & ZZ-BGT Closure Reports - check in both places for documents))

NO RECORD FOUND ✓ Proof of Closure (72 Hour Notice) e-mail to NMOCD E-mail notice located @ S:\gsREG\WELLS LIST\WELL NAME\72 Hour Notice BGT Closure (for post 2008 BGT's.) or research through Jamie's Folder in LRM (subfolders designated) - some have been moved to Wells List or Regulatory Pits\New Requirements\BGT\_Closure Report\_e-mails\some don't exist at all.

NO RECORD FOUND ✓ Surface Owner Notification -(S:\gsREG\Wells List\Well Name) Saved copy of e-mail you sent

12/8/14 (12) ✓ Pictures (Pit Closure Form located @ S:\gsProj\tssjd-copy\Construction\Open Pit Inspections (EEF170). Print the reclamation form for reference of Closure Date for C144 (use Start of Reclamation as the Closure Date)-If Reclamation has not taken place, we only need a picture of when they backfilled after removing the BGT.

12/8/14 (12) ✓ C144 with correct operator, well name, lat/long., surface owner (S:\gs REG\Regulatory Pits (ADM090-12yrs)\New Requirements\C-144 Forms\Pre 2013 C144 Forms\BGT Closure (OLD)-Closure date for BGT's that have not had reclamation work done would be the date the samples were taken when BGT was removed.

12/8/14 (12) ✓ Below-grade Tank Closure Report Summary w/ C-141 (S:\gs REG\Regulatory Pits (ADM090-12yrs)\New Requirements\BGT Closure Summary Report Templates\Normal or Without Reclamation C-141 found @ S:\gsHSE\Element 6-Programs & Procedures\Underground Storage Tanks, Vessels, & Pits\Tank and Line Test Results HSE800 E+20Y\Below Grade Tanks

Order for submitting the packet

1. C144 Form
2. BGT Closure Report Summary
3. Proof of Closure (72 Hour Notice) e-mail to NMOCD
4. BGT Closure Report from HSE & C141 Form
5. Sampling Results
6. Pictures

The items on this checklist need to be checked off and initialed by the person completing the work and must accompany the C-144 Closure Packet when it is handed off for QC and the QC person must initial it as well. This checklist is to be scanned into Wells List & DSM as part of the BGT Closure Packet.

Pre-BGT Closure Check List - Well Name: Kessler Com 3A  
 (S:\gs\REG\Regulatory Pits (ADiv\090-12yrs)\New Requirements\Checklists\Pre-BGT Closure Check Lists)

NO RECORD  
 - HISTORICAL

E-Mail received from O&M for P&A Facility Strip Notice  
 (Save this e-mail in the Wells List - S:\gs\REG\1 Wells List under well name)

12/8/14 @

Verify Twinned Location (Check in DSM under General Tab for notes about twinned well or check 1<sup>st</sup> Delivery Database under Facilities located on MPAD)

1/23/15  
 H

N/A

Call or e-mail Area MSO (Ask them to verify if there is a BGT on location and have them send you a picture to verify. Save the picture -S:\gs\REG\1 Wells List under well name)

12/8/14 @

Request Closure Plan Approval from Santa Fe - (If this is a historic BGT Closure and the well is on the BGT Master List an e-mail is sent to Leonard Lowe @ Leonrd.Lowe@state.nm.us)

NO RECORD  
 FOUND

Send 72-hour closure notification to NMOCD (In the e-mail received from O&M there is an 'estimated start date', use this start date when sending your 72-hour but not more than one week notice to NMOCD)

NO RECORD  
 FOUND

Send 72-hour Surface Owner Notification (If surface owner is BLM/Tribal then we send an e-mail notification to Mark Kelly and Shari Ketchum giving notification that a BGT will be closed) (Note: previously we were submitting the 'original' surface owner notification that was submitted with the Permit; however, that part of the process was incorrect according to Cory @ NMOCD and going forward we will need to send this notification) For the Historic Closures, we will be stating that the notification cannot be found in our Closure Summary Report.

The items on this checklist need to be checked off and initialed by the person completing the work and must accompany the C-144 Closure Packet when it is handed off for QC and the QC person must initial it as well. This checklist is to be scanned into Wells List & DSM as part of the BGT Closure Packet.