

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.

PERMIT #13027  
45-13034

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

RECEIVED  
By OCD at 3:50 pm, Jul 09, 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: ConocoPhillips Company OGRID #: 217817  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: Delhi Taylor #5  
API Number: 30-045-13034 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr A (NENE) Section 17 Township 26N Range 11W County: San Juan  
Center of Proposed Design: Latitude 36.49275 °N Longitude -108.02066 °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 \_\_\_\_\_

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

**NOT APPROVED**

Additional Soil samples required. No BTEX Samples included.

4.  
 **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
 Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, 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.

**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

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

- 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 application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

- Yes  No

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

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Yes  No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

Yes  No

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

Yes  No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Yes  No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Yes  No

Within a 100-year floodplain.

- FEMA map

Yes  No

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: \_\_\_\_\_ Approval Date: \_\_\_\_\_

Title: \_\_\_\_\_ 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: November 17, 2011

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 \_\_\_\_\_ °N \_\_\_\_\_ Longitude \_\_\_\_\_ °W 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): Denise Journey Title: Staff Regulatory Technician

Signature:  Date: 3/24/2015

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

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

**Lease Name: Delhi Taylor #5**  
**API No.: 30-045-13034**

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.

7. A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.13 (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:
- Operator's name
  - 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 placed 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 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 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.**



Animas Environmental Services, LLC

[www.animasenvironmental.com](http://www.animasenvironmental.com)

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3274

December 7, 2011

Shelly Cowden-Cook  
ConocoPhillips  
3401 East 30<sup>th</sup> Street, Office #490  
Farmington, NM 87402

**RE: Soil Sampling Results for Delhi Taylor #5 Below Ground Tank Closure  
San Juan County, New Mexico**

Dear Ms. Cowden-Cook:

Animas Environmental Services, LLC (AES) is pleased to provide the soil sampling results associated with the below ground tank (BGT) closure of a waste tank at ConocoPhillips (CoP) Delhi Taylor #5, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES's work at the subject location.

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## 1.0 Site Information

### 1.1 Location

The Delhi Taylor #5 well site is located within the NE $\frac{1}{4}$  NE $\frac{1}{4}$ , Section 17, T26N, R11W, San Juan County, New Mexico. Latitude and longitude of the BGT excavation were recorded as N36°29.566' and W108°01.241', respectively. The site is located on Bureau of Land Management (BLM) land. A topographic site location map is included as Figure 1, and an aerial map with the BGT location is included as Figure 2.

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed. Based upon a Pit Closure Report dated June 1999 on file with the NMOCD, depth to groundwater at the site was reported to be greater than 100 feet below ground surface (bgs), distance to the nearest surface water was more than 1000 feet, and the location is not within a well-head protection area. Once on-site, AES personnel confirmed the NMOCD ranking information using topographical interpretation and visual reconnaissance.

### 1.2 Site Activities

AES was initially contacted by Sheldon Montoya of CoP on November 11, 2011, and on November 17, 2011, Ross Kennemer and Debbie Watson of AES went to the subject location.

AES personnel collected five soil samples from below the BGT liner. Four samples were collected from the middle of the excavation side walls, and one sample was collected from the center of the BGT footprint.

---

## 2.0 Soil Sampling

On November 17, 2011, AES personnel conducted field screening and collected five soil samples from below the BGT. A backhoe was used to collect soil samples from approximately 6 to 8 inches below the former BGT for volatile organic compounds (VOCs), total petroleum hydrocarbon (TPH) and chloride field screening. Soil sample locations are included on Figure 2.

### 2.1 Soil Field Screening

#### 2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with isobutylene gas. VOC readings were recorded and ranged from 0.0 to 0.2 parts per million (ppm). OVM measurement locations and results are presented in Table 1 and on Figure 2.

#### 2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting any soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*. TPH concentrations ranged from 12.1 mg/kg to 21.0 mg/kg, and TPH results are summarized in Table 1 and on Figure 2. Field screening reports are attached.

#### 2.1.3 Chlorides

Soil samples were field screened for chlorides using Chloride Quan Tab Test Strips. Sampling and analysis methods followed procedures provided by Hach Company. Four field tests for chloride showed concentrations below 32 mg/kg, while one field test for chlorides (S-3) showed a concentration of 126 mg/kg. Confirmation soil samples were also collected and submitted to the analytical laboratory. Chloride field screening results are summarized in Table 1 and on Figure 2. Field screening reports are attached.

## 2.2 Soil Laboratory Analyses

The five soil samples collected for laboratory analysis were placed into new, clean, laboratory-supplied containers, which were then labeled, placed on ice, and logged onto a sample chain of custody record. Samples were maintained on ice until delivery to the analytical laboratories, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. The soil samples were laboratory analyzed for:

- Chlorides per EPA Method 300.0

## 2.3 Soil Field and Laboratory Analytical Results

Field and analytical laboratory results are summarized in the table below.

Table 1. Soil OVM, TPH, and Chlorides, Delhi Taylor #5

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth Below BGT (ft)</i>	<i>OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>	<i>Laboratory Confirmation Chlorides (mg/kg)</i>
<b>NMOCD Action Level</b>			<b>100</b>	<b>1000</b>	<b>1000</b>	<b>1000</b>
S-1	11/17/11	0.5	0.0	12.1	<32	<30
S-2	11/17/11	0.5	0.0	15.1	<32	31
S-3	11/17/11	0.5	0.0	18.0	126	<30
S-4	11/17/11	0.5	0.2	15.1	<32	<30
S-5	11/17/11	0.5	0.0	21.0	<32	<30

OVM, TPH and chloride concentrations for the five soil samples were either below laboratory detection limits or below applicable NMOCD action levels for contaminants of concern. Laboratory analytical reports are attached.

## 3.0 Conclusions and Recommendations

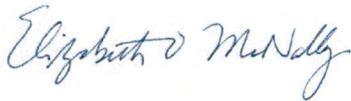
Based on field testing and laboratory analytical results for the soil samples collected on November 17, 2011, in association with the BGT closure for the Delhi Taylor #5, soil concentrations are below applicable NMOCD action levels for contaminants of concern.

If you have any questions about this report or site conditions, please do not hesitate to contact me or Elizabeth McNally at (505) 564-2281.

Sincerely,



Kelsey Christiansen  
Staff Scientist



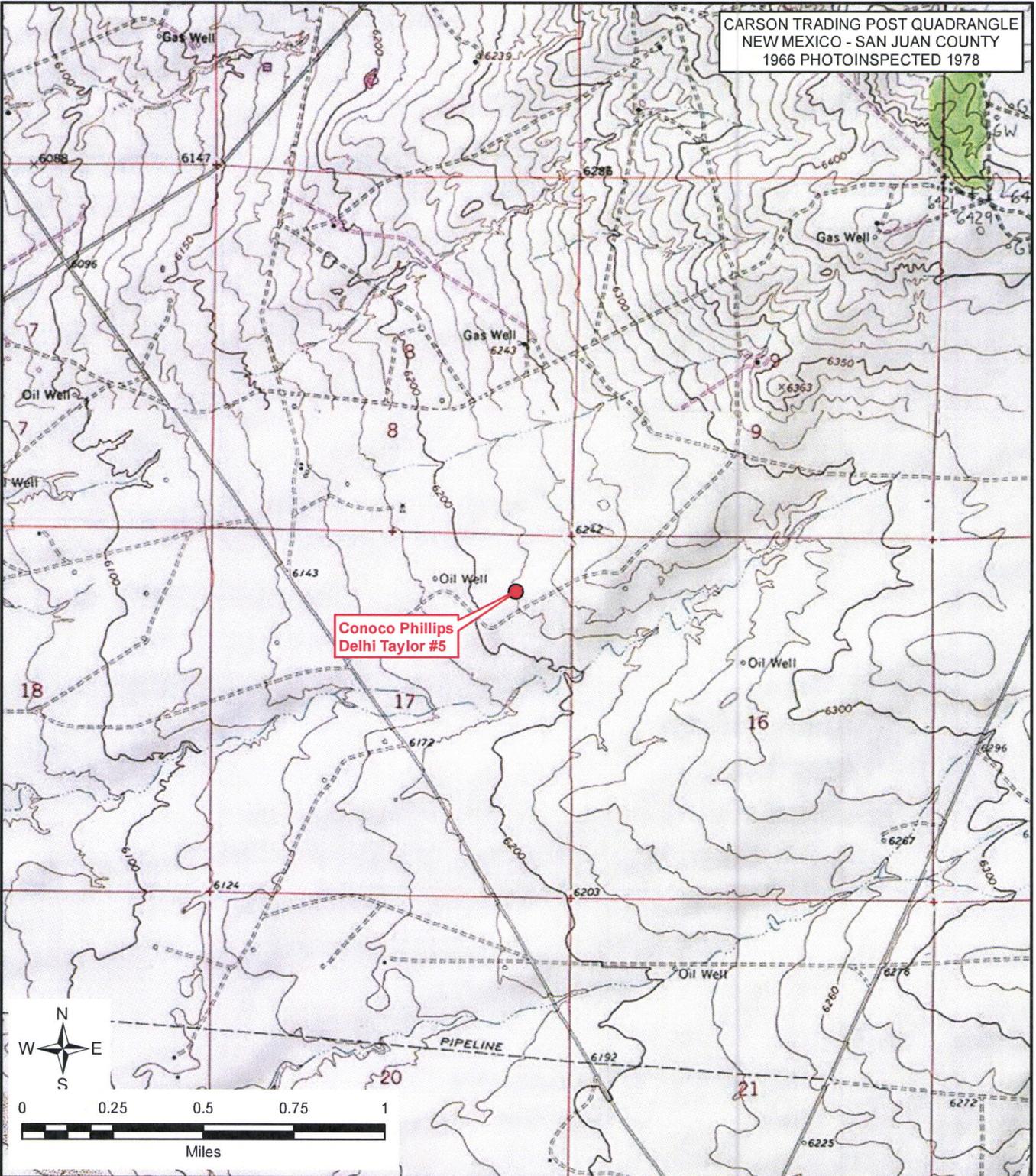
Elizabeth McNally, P.E.

Attachments:

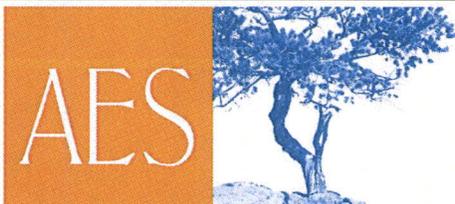
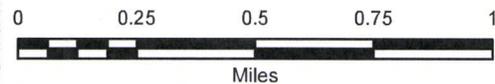
- Figure 1. Topographic Site Location Map
- Figure 2. General Site Plan, November 2011
- AES TPH and Chloride Field Screening Report 111711
- Hall Analytical Report 111780

S:\Animas 2000\2011 Projects\Conoco Phillips\Delhi Taylor #5\Reports\Delhi Taylor #5 Letter report  
120711 final.docx

CARSON TRADING POST QUADRANGLE  
 NEW MEXICO - SAN JUAN COUNTY  
 1966 PHOTOINSPECTED 1978



Conoco Phillips  
 Delhi Taylor #5



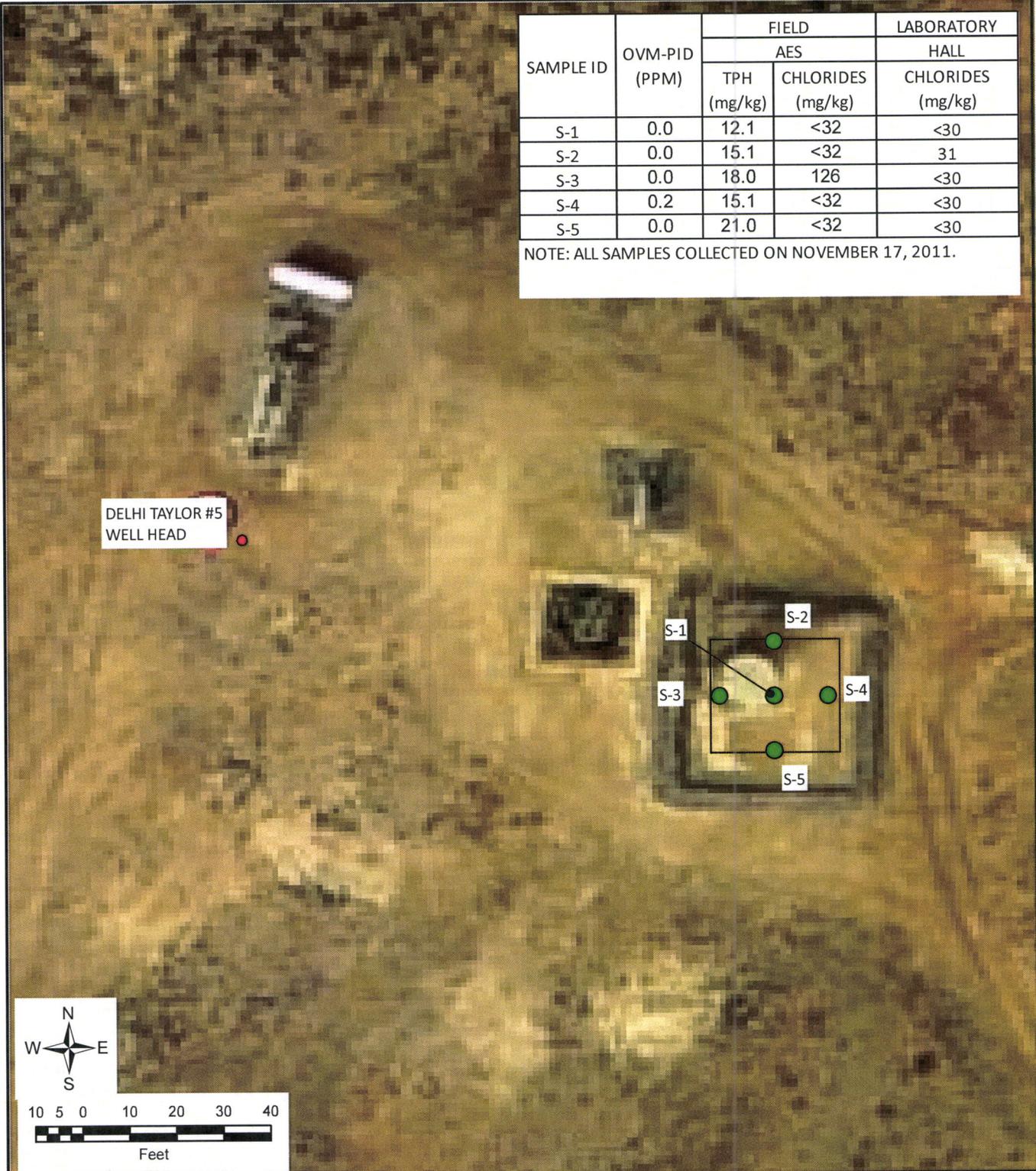
Animas Environmental Services, LLC

<b>DRAWN BY:</b> C. Lameman	<b>DATE DRAWN:</b> December 7, 2011
<b>REVISED BY:</b> C. Lameman	<b>DATE REVISED:</b> December 7, 2011
<b>CHECKED BY:</b> E. McNally	<b>DATE CHECKED:</b> December 7, 2011
<b>APPROVED BY:</b> E. McNally	<b>DATE APPROVED:</b> December 7, 2011

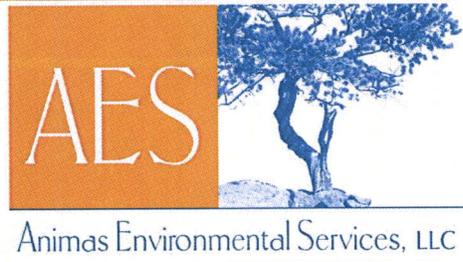
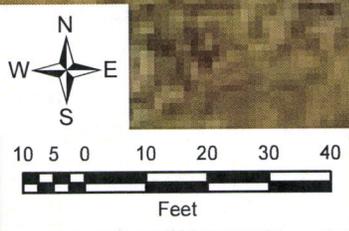
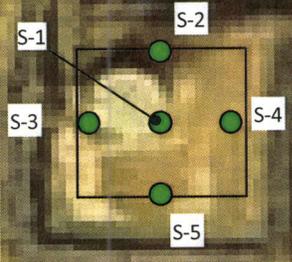
**FIGURE 1**  
**TOPOGRAPHIC SITE LOCATION MAP**  
 CONOCO PHILLIPS  
 DELHI TAYLOR #5  
 SAN JUAN COUNTY, NEW MEXICO  
 NE1/4, NE1/4, Section 17, T26N, R11W  
 N36° 29.572', W108° 01.254'

SAMPLE ID	OVM-PID (PPM)	FIELD		LABORATORY
		AES		HALL
		TPH (mg/kg)	CHLORIDES (mg/kg)	CHLORIDES (mg/kg)
S-1	0.0	12.1	<32	<30
S-2	0.0	15.1	<32	31
S-3	0.0	18.0	126	<30
S-4	0.2	15.1	<32	<30
S-5	0.0	21.0	<32	<30

NOTE: ALL SAMPLES COLLECTED ON NOVEMBER 17, 2011.



DELHI TAYLOR #5  
WELL HEAD



<b>DRAWN BY:</b> C. Lameman	<b>DATE DRAWN:</b> December 7, 2011
<b>REVISED BY:</b> C. Lameman	<b>DATE REVISED:</b> December 7, 2011
<b>CHECKED BY:</b> E. McNally	<b>DATE CHECKED:</b> December 7, 2011
<b>APPROVED BY:</b> E. McNally	<b>DATE APPROVED:</b> December 7, 2011

**FIGURE 2**  
**GENERAL SITE PLAN**  
**BELOW GRADE TANK CLOSURE**  
**NOVEMBER 2011**  
CONOCO PHILLIPS  
DELHI TAYLOR #5  
SAN JUAN COUNTY, NEW MEXICO  
NE1/4, NE1/4, Section 17, T26N, R11W  
N36° 29.572', W108° 01.254'

# AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3274

Client: ConocoPhillips

Project Location: Delhi Taylor #5

Date: 11/17/2011

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Location	OVM (ppm)	Field Chloride (ppm)	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-1	11/17/2011	12:19	CENTER	0.0	<32	12.1	20.0	1	DAW
S-2	11/17/2011	12:23	NORTH	0.0	<32	15.1	20.0	1	DAW
S-3	11/17/2011	12:26	EAST	0.0	126	18.0	20.0	1	DAW
S-4	11/17/2011	12:30	SOUTH	0.2	<32	15.1	20.0	1	DAW
S-5	11/17/2011	12:33	WEST	0.0	<32	21.0	20.0	1	DAW

Field Chloride - Quantab Chloride Titrators or Drop Count  
Titration with Silver Nitrate  
Total Petroleum Hydrocarbons - USEPA 418.1

Analyst: *Debrah Water*

PQL Practical Quantitation Limit  
ND Not Detected at the Reporting Limit  
DF Dilution Factor

\*Field TPH concentrations recorded may be below PQL.



COVER LETTER

Monday, November 21, 2011

Ross Kennemer  
Animas Environmental Services  
624 East Comanche  
Farmington, NM 87401

TEL: (505) 564-2281

FAX (505) 324-2022

RE: Conoco Phillips Delhi Taylor #5 BGT Closure

Order No.: 1111780

Dear Ross Kennemer:

Hall Environmental Analysis Laboratory, Inc. received 5 sample(s) on 11/18/2011 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901

AZ license # AZ0682

# Hall Environmental Analysis Laboratory, Inc.

Date: 21-Nov-11

**CLIENT:** Animas Environmental Services  
**Project:** Conoco Phillips Delhi Taylor #5 BGT Closure

**Lab Order:** 1111780

**Lab ID:** 1111780-01 **Collection Date:** 11/17/2011 12:19:00 PM

**Client Sample ID:** S-1 **Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	ND	30		mg/Kg	20	Analyst: BRM 11/18/2011 12:10:15 PM

**Lab ID:** 1111780-02 **Collection Date:** 11/17/2011 12:33:00 PM

**Client Sample ID:** S-2 **Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	31	30		mg/Kg	20	Analyst: BRM 11/18/2011 12:27:40 PM

**Lab ID:** 1111780-03 **Collection Date:** 11/17/2011 12:26:00 PM

**Client Sample ID:** S-3 **Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	ND	30		mg/Kg	20	Analyst: BRM 11/18/2011 12:45:04 PM

**Lab ID:** 1111780-04 **Collection Date:** 11/17/2011 12:30:00 PM

**Client Sample ID:** S-4 **Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	ND	30		mg/Kg	20	Analyst: BRM 11/18/2011 1:02:29 PM

**Lab ID:** 1111780-05 **Collection Date:** 11/17/2011 12:33:00 PM

**Client Sample ID:** S-5 **Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS Chloride	ND	30		mg/Kg	20	Analyst: BRM 11/18/2011 1:19:54 PM

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

**QA/QC SUMMARY REPORT**

**Client:** Animas Environmental Services  
**Project:** Conoco Phillips Delhi Taylor #5 BGT Closure

**Work Order:** 1111780

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
---------	--------	-------	-----	--------	---------	------	----------	-----------	------	----------	------

**Method:** EPA Method 300.0: Anions

<b>Sample ID:</b> 1111780-05AMSD		<i>MSD</i>									
Chloride	ND	mg/Kg	30	15	10.07	84.8	79.6	112	0	20	
<b>Sample ID:</b> MB-29434		<i>MBLK</i>									
Chloride	ND	mg/Kg	1.5								
<b>Sample ID:</b> LCS-29434		<i>LCS</i>									
Chloride	14.11	mg/Kg	1.5	15	0	94.1	90	110			
<b>Sample ID:</b> 1111780-05AMS		<i>MS</i>									
Chloride	ND	mg/Kg	30	15	10.07	92.9	79.6	112			

**Qualifiers:**

- |    |  |    |  |
|----|--|----|--|
| E  | Estimated value                            | H  | Holding times for preparation or analysis exceeded |
| J  | Analyte detected below quantitation limits | NC | Non-Chlorinated                                    |
| ND | Not Detected at the Reporting Limit        | R  | RPD outside accepted recovery limits               |

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name ANIMAS ENVIRONMENTAL

Date Received:

11/18/2011

Work Order Number 1111780

Received by: AT

Checklist completed by:

Signature

*[Handwritten Signature]*

Date

Sample ID labels checked by:

*A/IO*  
Initials

11/18/11

Matrix:

Carrier name FedEx

- Shipping container/cooler in good condition? Yes  No  Not Present
- Custody seals intact on shipping container/cooler? Yes  No  Not Present  Not Shipped
- Custody seals intact on sample bottles? Yes  No  N/A
- Chain of custody present? Yes  No
- Chain of custody signed when relinquished and received? Yes  No
- Chain of custody agrees with sample labels? Yes  No
- Samples in proper container/bottle? Yes  No
- Sample containers intact? Yes  No
- Sufficient sample volume for indicated test? Yes  No
- All samples received within holding time? Yes  No
- Water - VOA vials have zero headspace? No VOA vials submitted  Yes  No
- Water - Preservation labels on bottle and cap match? Yes  No  N/A
- Water - pH acceptable upon receipt? Yes  No  N/A
- Container/Temp Blank temperature? 1.4° <6° C Acceptable

Number of preserved bottles checked for pH:

<2 >12 unless noted below.

COMMENTS:

-----

Client contacted \_\_\_\_\_ Date contacted: \_\_\_\_\_ Person contacted \_\_\_\_\_

Contacted by: \_\_\_\_\_ Regarding: \_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective Action \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



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

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

Form C-141  
Revised August 8, 2011

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

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company ConocoPhillips Company	Contact Denise Journey
Address 3401 East 30 <sup>th</sup> St., Farmington, NM 87402	Telephone No. 505-326-9556
Facility Name <b>Delhi Taylor #5</b>	Facility Type Gas Well

Surface Owner Tribal	Mineral Owner Federal Lease # SF-079679	API No. 30-045-13034
----------------------	---	----------------------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	17	26N	11W	790	North	790	East	San Juan

Latitude 36.49275 Longitude -107.02066

**NATURE OF RELEASE**

Type of Release None – BGT Closure Summary	Volume of Release N/A	Volume Recovered N/A
Source of Release NONE	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

N/A

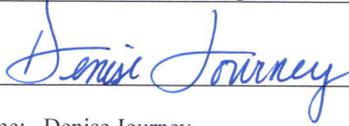
Describe Cause of Problem and Remedial Action Taken.\*

N/A

Describe Area Affected and Cleanup Action Taken.\*

BGT Closure: NO RELEASE FOUND UPON CLOSURE

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: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Denise Journey	Approved by Environmental Specialist:	
Title: Staff Regulatory Technician	Approval Date:	Expiration Date:
E-mail Address: Denise.Journey@conocophillips.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 3/24/15	Phone: 505-326-9556	

\* Attach Additional Sheets If Necessary







**BGT Closure Packet Check List - Well Name:** Delhi Taylor S  
 (S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\BGT Closure Check List)

✓ 12/10/14 @ 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))

✓ 12/10/14 @ 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

✓ 12/10/14 @ 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.

12/10/14 @ 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.

no done 3/24/15 [Signature] 12/10/14 @ Below-grade Tank Closure Report Summary w/ C-141 - Re-done 3/24  
 (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: Delhi Taylor 5  
(S:\gsRED\Regulatory Pits (ADM090-12yrs)\New Requirements\Checklists\Pre-BGT Closure Check List)

NO RECORD  
- HISTORICAL

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

12/10/14 @

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)

3/24/15  
~~3/24/15~~

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:\gsREG\1 Wells List under well name)

12/10/14 @

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)

N/A

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)

N/A

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.