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.

**RECEIVED** Pit, Below-Grade Tank, or By kcollins at 1:09 pm, Apr 11, 2016 Proposed Alternative Method Permit or Closure Plan Application Below grade tank registration Type of action: 14645 Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances. Operator: ConocoPhillips Company OGRID #: 217817 Address: PO BOX 4289, Farmington, NM 87499 Facility or well name: SAN JUAN 28-7 UNIT NP 40 API Number: 30-039-07074 OCD Permit Number: U/L or Qtr/Qtr H (SENE) Section 18 Township 27N Range 7W County: Rio Arriba Surface Owner: Federal State Private Tribal Trust or Indian Allotment Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover ☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management ☐ Low Chloride Drilling Fluid ☐ yes ☐ no ☐ Lined ☐ Unlined Liner type: Thickness mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other ☐ String-Reinforced Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D Below-grade tank: Subsection I of 19.15.17.11 NMAC bbl Type of fluid: Produced Water 120 Volume: 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 

Alternative Method:

institution or church)

Alternate. Please specify

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

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,

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)

Four foot height, four strands of barbed wire evenly spaced between one and four feet

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							
Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  Please check a box if one or more of the following is requested, if not leave blank:  Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.							
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acce material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source						
General siting							
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☑ NA						
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells							
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. ( <b>Does not apply to below grade tanks</b> )  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No						
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No						
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No						
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No						
Below Grade Tanks							
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.	☐ Yes ☐ No						
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image							
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number:  or Permit Number:	NMAC 15.17.9 NMAC
11.  Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC	
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  A List of wells with approved application for permit to drill associated with the pit.  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC  Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Previously Approved Design (attach copy of design) API Number:	15.17.9 NMAC
	1

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC	documents are
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	
<ul> <li>Quality Control/Quality Assurance Construction and Installation Plan</li> <li>○ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>○ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>○ Nuisance or Hazardous Odors, including H₂S, Prevention Plan</li> <li>○ Emergency Response Plan</li> <li>○ Oil Field Waste Stream Characterization</li> </ul>	
<ul> <li>☐ Monitoring and Inspection Plan</li> <li>☐ Erosion Control Plan</li> <li>☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC</li> </ul>	
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F	luid Management Pit
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.	-4-1-1-4-
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached.  ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15. Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 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	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
<ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	Yes No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
- TEMA map	
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan by a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 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  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards canr  Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	.11 NMAC .15.17.11 NMAC
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 bel	ief.
Name (Print):	
D-4	
Signature: Date:	
e-mail address: Telephone:	
e-mail address: Telephone:	
e-mail address:	
e-mail address: Telephone:	
e-mail address:	2016 g the closure report.
e-mail address:    Telephone:	2016  g the closure report. t complete this
e-mail address:    Telephone:	2016  g the closure report. t complete this

22.
Operator Closure Certification:
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print) Crystal Walker Title: Regulatory Coordinator
Signature: Date: 4/1/16
e-mail address: <u>crystal.walker@cop.com</u> Telephone: (505) 326-9837

# ConocoPhillips Company San Juan Basin Below Grade Tank Closure Report

Lease Name: San Juan 28-7 Unit NP 40

API No.: 30-039-07074

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:

COPC 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, COPC will file the C144 Closure Report as required.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

COPC 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.

3. COPC 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.

4. If there is any on-site equipment associated with a below-grade tank, then COPC 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.

5. COPC 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.

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). Form C-141 is 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 300.0	250

6. If COPC or the division determines that a release has occurred, then COPC 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.

7. 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 COPC 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.

- 8. 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 attached.

9. The surface owner shall be notified of COPC'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 was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

10. 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.

11. COPC 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.

12. 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.

- 13. 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)

#### Walker, Crystal

From:

Walker, Crystal

Sent:

Thursday, March 10, 2016 12:29 PM

To:

Cory Smith; Jonathan Kelly; Katherina Diemer (kdiemer@blm.gov); Flaniken, Jon

(mflanike@blm.gov)

Cc:

GRP:SJBU Regulatory; SJBU E-Team; Farrell, Juanita R; Notor, Lori;

'eskyles@animasenvironmental.com'

Subject:

BGT Re-Sample Notification for sampling 3/16 & 3/17

Good afternoon,

The following locations contained below-grade tanks that require re-sampling, which is scheduled for Wednesday, March 16<sup>th</sup> and Thursday, March 17<sup>th</sup> will begin at 9:00am at the first location and continue to the next.

Sampling Order	Name	Sampling Date	BGT LATITUDE	BGT LONGITUDE
1	CHACO PLANT 28	3/16/16	36.486129	-108.056724
2	GRAHAM 1R	3/16/16	36.541435	-107.869382
3	HALE 5	3/16/16	36.849354	-107.668026
4	HALE 1	3/16/16	36.873086	-107.657422
5	PRICE 2	3/17/16	36.656857	-107.656942
6	GRAMBLING A 9	3/17/16	36.636696	-107.680815
7	SAN JUAN 28-7 UNIT NP 40	3/17/16	36.575822	-107.610690
8	HAMMOND WN FEDERAL 6	3/17/16	36.541962	-107.658297

Please feel free to contact me at any time if you have any questions or concerns regarding this information.

Thank you,

#### Crystal Walker

Regulatory Coordinator ConocoPhillips Lower 48

T: 505-326-9837 | F: 505-599-4086 | M: 505-215-4361 | crystal.walker@cop.com

Visit the new Lower 48 website: www.conocophillipsuslower48.com

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

### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

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

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

			Rele	ease Notific	cation	and Co	orrective A	ection	1				
						OPERA'	ГOR		☐ Initia	al Report	$\boxtimes$	Final Repor	
Name of Co	ompany Cor	nocoPhillip	s Compa	ny		Contact Crystal Walker							
Address 340							No.(505) 326-9	837					
Facility Nat	ne: San Juar	n 28-7 Uni	t NP 40		59	Facility Typ	e: Gas Well						
Surface Ow	ner FEDER	RAL		Mineral C	)wner	FEDERAL			API No	. 30-039-0	7074		
				LOCA	ATIO	OF RE	LEASE						
Unit Letter H	Section 7	Township <b>27N</b>	Range 7W	Feet from the 1650	100000000000000000000000000000000000000	South Line North	Feet from the 950		West Line East	County Rio Arrib	a		
			Latitude	36.575822	Long	itude <u>-10</u>	7.610690						
				NAT	URE	OF REL	EASE						
Type of Rele						Volume of			1 000 miles control to	Recovered			
Source of Re	lease					Date and I	Iour of Occurrent	ce	Date and	Hour of Dis	covery		
Was Immedi	ate Notice Giv		Yes [	No 🛛 Not Re	equired	If YES, To	Whom?						
By Whom?						Date and I-	Iour						
	course Reach					If YES, Vo	olume Impacting	the Wate	ercourse.				
			Yes 🛛 1	No									
If a Watercou	ırse was Impa	acted, Descr	ibe Fully.*										
N/A													
Describe Cau													
No release w	as encounter	red during	the BGT (	Closure.									
Describe Are	a Affected an	d Cleanup A	Action Tak	en.*									
N/A													
						1 . 6		N Z	1.1		OCD	· · · ·	
							knowledge and u nd perform correc						
public health	or the enviro	nment. The	acceptance	e of a C-141 repo	ort by the	e NMOCD m	arked as "Final R	Report" d	loes not reli	ieve the oper	ator of	liability	
should their	operations have	ve failed to	adequately	investigate and r	emediate	e contaminati	on that pose a thr	reat to gr	round water	r, surface wa	ter, hui	man health	
				tance of a C-141	report d	oes not reliev	e the operator of	respons	ibility for c	ompliance w	ith any	other	
federal, state	, or local laws	and/or regu	mations.				OIL CON	SERV	ATION	DIVISIO	)N		
Signature:	0	1 1	1.1	11			OIL CON	DLIK V	TITOIN	אנטו ז יער	111		
	-	Tal	Wa	lken									
Printed Name	e: Crystal Wa	alker			84	Approved by	Environmental S	Specialis	t:				
Title: Regul	atory Coordi	inator				Approval Da	te:		Expiration 1	Date:			
E-mail Addre	ess: crystal.v	valker@cop	.com		10	Conditions of	f Approval:			A4411			
1,1	1.						:6:0			Attached			
Date: 9		Phone: (505		7									
Attach Addi	tional Sheets	s If Necess	ary										



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

March 28, 2016

Emilee Skyles Animas Environmental 604 Pinon Street Farmington, NM 87401 TEL: (505) 564-2281

FAX

RE: COPC SJ 28-7 UNIT NP 40

OrderNo.: 1603944

#### Dear Emilee Skyles:

Hall Environmental Analysis Laboratory received 1 sample(s) on 3/17/2016 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. 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. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

#### **Analytical Report**

#### Lab Order 1603944

Date Reported: 3/28/2016

## Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** Animas Environmental

Client Sample ID: S-1

Project: COPC SJ 28-7 UNIT NP 40

Collection Date: 3/16/2016 11:45:00 AM

Lab ID: 1603944-001

Matrix: SOIL Received I

Received Date: 3/17/2016 7:33:00 AM

Analyses	Result	PQL Qua	l Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH					Analyst	: TOM
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	3/23/2016	24342
EPA METHOD 300.0: ANIONS					Analyst	: LGT
Chloride	130	30	mg/Kg	20	3/24/2016 4:40:18 PM	24423
EPA METHOD 8021B: VOLATILES					Analyst	: NSB
Benzene	ND	0.024	mg/Kg	1	3/19/2016 8:55:35 AM	24328
Toluene	ND	0.048	mg/Kg	1	3/19/2016 8:55:35 AM	24328
Ethylbenzene	ND	0.048	mg/Kg	1	3/19/2016 8:55:35 AM	24328
Xylenes, Total	ND	0.096	mg/Kg	1	3/19/2016 8:55:35 AM	24328
Surr: 4-Bromofluorobenzene	110	80-120	%Rec	1	3/19/2016 8:55:35 AM	24328

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits Page 1 of 4
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

# **QC SUMMARY REPORT**

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1603944

28-Mar-16

Client:

Animas Environmental

Project:

COPC SJ 28-7 UNIT NP 40

Sample ID MB-24423

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 24423

PQL

1.5

RunNo: 33065

Prep Date:

SeqNo: 1014659

Units: mg/Kg

Analyte

3/24/2016

Analysis Date: 3/24/2016

SPK value SPK Ref Val %REC LowLimit

HighLimit

**RPDLimit** %RPD

Qual

Chloride

Result ND

SampType: LCS

TestCode: EPA Method 300.0: Anions

Client ID:

LCSS

Batch ID: 24423

RunNo: 33065

Units: mg/Kg

Prep Date: 3/24/2016

Sample ID LCS-24423

Analysis Date: 3/24/2016

SegNo: 1014660 %REC

HighLimit

**RPDLimit** 

Analyte

Result

15.00

90

%RPD

Chloride

14

93.6

Qual

PQL 1.5

SPK value SPK Ref Val

LowLimit

110

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- Holding times for preparation or analysis exceeded H
- ND Not Detected at the Reporting Limit
- RPD outside accepted recovery limits R % Recovery outside of range due to dilution or matrix S
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- Page 2 of 4

- P Sample pH Not In Range
- Reporting Detection Limit RL
- Sample container temperature is out of limit as specified

# **QC SUMMARY REPORT**

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1603944 28-Mar-16

Client:

Animas Environmental

Project:

COPC SJ 28-7 UNIT NP 40

Sample ID MB-24342

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID: **PBS** 

Batch ID: 24342

PQL

20

RunNo: 32998

Prep Date: 3/21/2016

Analysis Date: 3/23/2016

SeqNo: 1012149

TestCode: EPA Method 418.1: TPH

LowLimit

83.4

Units: mg/Kg

Analyte

Result ND

HighLimit

%RPD **RPDLimit**  Qual

Petroleum Hydrocarbons, TR

Client ID:

SampType: LCS

%REC

RunNo: 32998

Prep Date: 3/21/2016

Sample ID LCS-24342

LCSS

Batch ID: 24342 Analysis Date: 3/23/2016

PQL

SeqNo: 1012150

109

Units: mg/Kg

Qual

Petroleum Hydrocarbons, TR

Result 110

20 100.0

SPK value SPK Ref Val %REC LowLimit

HighLimit 127

**RPDLimit** %RPD

SPK value SPK Ref Val

TestCode: EPA Method 418.1: TPH

Client ID: LCSS02

Sample ID LCSD-24342

SampType: LCSD

Batch ID: 24342

RunNo: 32998 SeqNo: 1012151

HighLimit

Units: mg/Kg

127

Qual

Analyte

Prep Date:

3/21/2016

Analysis Date: 3/23/2016 Result

100

PQL

SPK value SPK Ref Val %REC

105

LowLimit 83.4 %RPD

**RPDLimit** 

20

Petroleum Hydrocarbons, TR

100.0

20

0

3.98

#### Qualifiers:

H

R

- Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix D Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

RPD outside accepted recovery limits

- % Recovery outside of range due to dilution or matrix S
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- J
- P Sample pH Not In Range
- Reporting Detection Limit Sample container temperature is out of limit as specified
- Analyte detected below quantitation limits
- Page 3 of 4

# QC SUMMARY REPORT

# Hall Environmental Analysis Laboratory, Inc.

WO#: 1603944

28-Mar-16

Client: Project:

Animas Environmental

A GORNAL FORM

COPC SJ 28-7 UNIT NP 40

Sample ID MB-24328	Samp	уре: <b>М</b> Е	BLK	Tes	tCode: E					
Client ID: PBS	Batcl	h ID: 24	328	F	RunNo: 3					
Prep Date: 3/18/2016	Analysis D	Date: 3/	19/2016	8	SeqNo: 1	008960	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.2		1.000		119	80	120			
Sample ID LCS-24328	Samp	Type: LC	s	Tes	tCode: E	PA Method	8021B: Volat	iles		
Client ID: LCSS	Batcl	Batch ID: 24328			RunNo: 32911					
Prep Date: 3/18/2016	Analysis D	Date: 3/	19/2016	8	SeqNo: 1	008961	Units: mg/K	g		
		96,000,000	consistence es	1200 (1200 CH) 1200 CH	2400200000000		10100 10 010 000	V-5651257545455	200200000000000	123 20

Ollotte ib. Loco	Date	020	5.50	TAGINTON DEBTT								
Prep Date: 3/18/2016	Analysis Date: 3/19/2016			8	SeqNo: 1008961 Units: mg/				√g			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	0.93	0.025	1.000	0	93.1	80	120					
Toluene	1.0	0.050	1.000	0	101	80	120					
Ethylbenzene	1.0	0.050	1.000	0	103	80	120					
Xylenes, Total	3.1	0.10	3.000	0	104	80	120					
Surr: 4-Bromofluorobenzene	1.2		1.000		121	80	120			S		

Sample ID 1603944-001AMS	Samp1	Гуре: М	6	Tes	TestCode: EPA Method 8021B: Volatiles					
Client ID: S-1	Batcl	h ID: 24	328	F	RunNo: 32911					
Prep Date: 3/18/2016	Analysis D	Date: 3/	19/2016	S	SeqNo: 1	008963	Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.99	0.024	0.9709	0	102	71.5	122			
Toluene	1.1	0.049	0.9709	0	112	71.2	123			
Ethylbenzene	1.1	0.049	0.9709	0	116	75.2	130			
Xylenes, Total	3.4	0.097	2.913	0.01398	115	72.4	131			
Surr: 4-Bromofluorobenzene	1.2		0.9709		121	80	120			S

Sample ID 1603944-001AM	ISD SampT	ype: <b>MS</b>	SD.	TestCode: EPA Method 8021B: Volatiles												
Client ID: S-1	Batch	ID: 24	328	F												
Prep Date: 3/18/2016	Analysis D	ate: 3/	19/2016	S	SeqNo: 1	008964	Units: mg/k	ζg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual						
Benzene	0.99	0.024	0.9615	0	103	71.5	122	0.0297	20							
Toluene	1.1	0.048	0.9615	0	115	71.2	123	1.63	20							
Ethylbenzene	1.2	0.048	0.9615	0	120	75.2	130	2.64	20							
Xylenes, Total	3.5	0.096	2.885	0.01398	120	72.4	131	3.17	20							
Surr: 4-Bromofluorobenzene	1.2		0.9615		124	80	120	0	0	S						

#### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

Page 4 of 4

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

# Sample Log-In Check List

-		AMM TRAFF		Wo-			****	- 10		
Client Name:	Animas Envir	ronmental	Work Order Nu	ımber: '	16039	44			Rcpt	No: 1
Received by/da	ate: H	$\gamma \gamma$	03/17/1	O						
Logged By:	Ashley Gall	egos	3/17/2016 7:33:0	MA 00			SAF			
Completed By:	Ashley Gall	egos	3/17/2016 6:17:5	57 PM			A			
Reviewed By:	0	) _	10/10/10/10/10				0			
When there is a second	ata du	7	03/18/16	10						
Chain of Cu	3000	mala hattlas?			Yes	1.1	No	["]	Not Present	
	eals intact on sai Custody comple				Yes		No		Not Present	
					Couri					
3. How was to	ne sample delive	eleu r			Coun	<u> </u>				
<u>Log In</u>										
4. Was an at	tempt made to o	cool the sample	es?		Yes		No		NA	
						o Carry		. 18		r 1
5. Were all sa	amples received	l at a temperat	ure of >0° C to 6.0°0	C	Yes		No	<u></u> I	NA	
6. Sample(s)	in proper conta	iner(s)?			Yes		No	ίĵ		
7. Sufficient s	sample volume f	for indicated te	st(s)?		Yes		No	[.]		
8. Are sample	es (except VOA	and ONG) pro	perly preserved?		Yes		No			
	ervative added to		•		Yes	$\prod$	No		NA	
NA AMERICAN IN THE RESIDENCE OF THE RESI					<b>17</b> 22 22 22	T"1	No		No VOA Vials	
	have zero head:		Tan agr		Yes Yes			[]	NO VOA VIAIS	<b>W</b> 1
11. Were any	sample contain	ers received b	roken?		Yes	LJ	NO		# of preserved	
12 Does page	erwork match bo	ttle lahels?			Yes		No		for pH:	iu
	repancies on ch							,ı	A divete	(<2 or >12 unless noted)
13. Are matric	es correctly ider	ntified on Chair	n of Custody?		Yes		No		Adjusted	J r
14. Is it clear v	what analyses w	ere requested	?		Yes		No		Checked	byr
	olding times abl fy customer for a				Yes		No	<u> </u> J	Ollecked	by.
(II IIO, IIOII	ly dustornor for t	authorization.,								
Special Han	ndling (if app	olicable)								
	t notified of all di		ith this order?		Yes		No	[]	NA	
	son Notified:	والمالية وا	Limiterials) & Heldard State Comple	Date T	<u>- 14 (141)</u>	1131,14,44 <b>,</b> 441	712-710EH-7229	.; 13-4, 4-4		
	Whom:		- Maria Balancial about accompany accompa	Via:	] eM	ail [7	Phone [	Fax	[ In Person	
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-15040	nt Instructions:	#. <del>7#18#\$5\$#\$</del> 55\$######	الماران المراجعة	L-    -		massenik eldt	<del></del>	****	فقده ويعمض بوصفائنات الطواليكم أم فيماناه ويستسم	nesid.
17. Additiona			*							
18. Cooler In	formation									
Cooler	1	Condition	Seal Intact   Seal	No   8	Seal D	ate	Signed	Ву	1	
1	2.2	Good	Yes	at at a		5.0	ē.			

	_								(	M 10	Y) səlddu8 riA						-			
HALL ENVIDONMENTAL	ANALYSIS LABORATORY	www.hallenvironmental.com	4901 Hawkins NE - Albuquerque, NM 87109	Tel. 505-345-3975 Fax 505-345-4107	aiy						TPH - EPA 418.	×						Remarks: Bill to Conoco Phillips WO # 21340555 Supervisor: Wyckoff USERID: MCINNSK Area: 7 Ordered by: Bobby Spearman		
_		-			0						HEALNO BYEX-8021B	x   100						Time Time	16 0455	
<del>.</del>	nsh				COPC SJ 28-7 UNIT NP 40							1						,	5117116 C	
ı ıme:	□ Rush	44			PC SJ 28-7	ger:	E. Skyles		CLUS	emberature Z	Preservative Type	000						Week	3	
um-Arouna   Ime:	X Standard	Project Name:		Project #:	8	Project Mana			Sampler:	1 1000	Container Type and #	1 - 4 oz.						Received by:    Muth.     Beceived by:	/ ラ ー	
Chain-of-Custody Record Animas Environmental Services, LLC X Standard	mental Services, LLC		604 W Pinon St.	Farmington, NM 87401		eskyles@animasenvironmental.com		☐ Level 4 (Full Validation)			Sample Request ID	S-1						J. Dale	3	
	s Enviror		604 W F	Farming	-2281	eskyles(	eskyles@				□ Other_		Matrix	SOIL						Relinquished by:
o-uain-o	Animas		ddress:		505-564-2281	ax#:	ckage:	5	tion:	(ype)	Time	1145						Time: 1750 Time: 1.06x	(3/)	
さ	Slient		Vailing Address:		hone #:	Email or Fax#:	2A/QC Package:	X Standard	Accreditation: ☐ NELAP	☐ EDD (Type)	Date	3/16/16						34e: 3/16/16 5ate:	21/01/	



