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

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

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application
13860 Type of action: Below grade tank registration RECEIVED 45-08346 Permit of a pit or proposed alternative method By Rvillalobos at 9:44 am, Dec 30, 2015 Modification to an existing permit/or registration Modification to an existing permit/or registration By Rvillalobos at 9:44 am, Dec 30, 2015 or proposed alternative method or proposed alternative method By Rvillalobos at 9:44 am, Dec 30, 2015
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: <u>Burlington Resources Oil & Gas Company, LP</u> OGRID #: <u>14538</u>
Address: _ PO BOX 4289, Farmington, NM 87499
Facility or well name: <u>W M Hanley 1</u>
API Number: OCD Permit Number:
U/L or Qtr/QtrF Section18 Township29N_ Range10W_ County: San Juan
Center of Proposed Design: Latitude36.728381_ <u>•N</u> Longitude 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 DWorkover
Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no
Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other
String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D
3. Subsection I of 19.15.17.11 NMAC
Volume:bbl Type of fluid:Produced Water
Tank Construction material: <u>Metal</u>
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 mil 🔲 HDPE 🛄 PVC 🖾 Other Unspecified
 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

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Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)

Screen Netting Other

6.

7

Monthly inspections (If netting or screening is not physically feasible)

Signs: Subsection C of 19.15.17.11 NMAC

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.16.8 NMAC

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

□ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank	□ Yes □ No ⊠ NA
 INM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. 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. (Does not apply to below grade tanks) Written confirmation or verification from the municipality; Written approval obtained from the municipality Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division Within an unstable area. (Does not apply to below grade tanks) Written confirmation or verification to map from the NM EMNRD-Mining and Mineral Division Within an unstable area. (Does not apply to below grade tanks) Written confirmation or verification to map from the NM EMNRD-Mining and Mineral Resources; USGS; NM Geological Society; Topographic map Within a 100-year floodplain. (Does not apply to below grade tanks) FEMA map Below Grade Tanks Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. NM Office of the State Engineer - iWATERS database searc	
adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks)	🗌 Yes 🗌 No
	🗌 Yes 🗌 No
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	🗌 Yes 🛄 No
Within a 100-year floodplain. (Does not apply to below grade tanks)	🗋 Yes 🗌 No
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. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division Within a nunstable 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 Within a 100-year floodplain. (Does not apply to below grade tanks) - - FEMA map Below Grade Tanks - Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM	
from the ordinary high-water mark).	🗌 Yes 🛛 No
	🗌 Yes 🛛 No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
- NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells ⊠ NA Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. ⊠ NA NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells ⊠ NA Within incorporated municipal boundaries or within a defined municipal fresh water well field cover dunder 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 □ N Within an unstable area. (Does not apply to below grade tanks) - Yes □ N - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map □ Yes □ N Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Yes ⊠ N - NA Office of the State Engineer - iWATERS database search; Used in spection (certification) of the proposed site - Yes ⊠ N Within 100 feet of a continuously flowing watercourse, significant watercourse or within 200 herizontal feet of a spring or a fresh water well used for public or livestock consumption; - No Office of the State Engineer - iWATER	
application.	🗌 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								
<u>Temporary Pit Non-low chloride drilling fluid</u>									
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 19.15.17.12 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 dot attached.	.15.17.9 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 a 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 19.15.17.9 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 Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Errospon Control Plan Errospon Control Plan Errospon Control Plan Closure Plan - based upon the appropriate requirements of 19.15.17.9 NMAC and 19.15.17.13 NMAC	locuments are
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 Fit 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 On-site Trench Burial On-site Closure Method	uid Management Pit
14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a 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 Model: 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	itlached to the
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 provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Pa 19.15.17.10 NMAC for guidance.	ce material are lease refer to
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
 Ground water is between 25-50 feet below the bottom of the buried waste NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells 	☐ Yes ☐ No ☐ NA
 Ground water is more than 100 feet below the bottom of the buried waste. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells 	☐ Yes ☐ No ☐ NA
 Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	🗋 Yes 🗌 No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	🗌 Yes 🗌 No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	□ Yes □ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

Oil Conservation Division

 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.									
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 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation 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 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 believed.	ef.								
Name (Print): LArissa Farrell Title: Regulatory Technicia	'n								
Signature: Kauna Janel Date: 12-22-15									
e-mail address: Larissa. I. farrell & cop. com Telephone: 505-326-9504									
18. <u>OCD Approva</u> I: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)									
OCD Representative Signature: for all D. Kelly Approval Date: 6/27/20	016								
Title: Compliance Officer O OCD Permit Number:									
^{19.} <u>Closure Report (required within 60 days of closure completion)</u> : 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting 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:February 13, 24									
 20. Closure Method: Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-lo If different from approved plan, please explain. 	op systems only)								
 21. <u>Closure Report Attachment Checklist</u>: Instructions: Each of the following items must be attached to the closure report. Please intermark in the box, that the documents are attached. New 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 	dicate, by a check								

22. Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report is belief. I also certify that the closure complies with all applicable closure requirements and	true, accurate and complete to the best of my knowledge and d conditions specified in the approved closure plan.
Name (Print): Larissa Farrell Title: Regulatory Technician	1
Signature:	Date:
e-mail address: Larissa.L.Farrell@cop.com Telephone: (505)326-9504	

Burlington Resources Oil & Gas Company San Juan Basin: New Mexico Assets Below Grade Tank Closure Report

Lease Name: WM Hanley 1 API No.: 30-045-08346

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 Requirements:

 Prior to initiating any BGT closure, except in the case of an emergency, BR will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or one week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.

The closure process notification to the landowner was not found.

- 2. Notice of closure will be given to the District Division office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
 - a. Operators Name
 - b. Well Name and API Number
 - c. Location

Notification of closure was not provided to the Aztec Division office between 72 hours and one week prior to closure.

 All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of COP's approved Salt Water Disposal facilities or at a District Division approved facility.

All recovered liquids were disposed of at an approved SWD facility or an approved District Division facility within 60 days of cessation of operation.

 Solids and sludge's will be shoveled and/or vacuumed out for disposal at one of the District Division approved facilities, depending on the proximity of the BGT site: Envirotech Land Farm (Permit #NM-01-011), JFJ Land Farm % Industrial Ecosystems Inc. (Permit #NM-01-0010B), and Basin Disposal (Permit #NM-01-005).

Any sludge or soil required to be removed to facilitate closure was transported to Envirotech Land Farm (Permit # NM-01-011) and/or JFJ Landfarm % IEI (Permit# NM-01-0010B).

5. BR will obtain prior approval from District Division to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the District Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste Management under NMED Permit SWM-052426.

The below-grade tank was disposed of in a division-approved manner. The liner was cleaned per 19.15.35.8.C(1)(m) NMAC and disposed of at the San Juan County Regional Landfill located on CR 3100.

6. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure, will be removed.

All on-site equipment associated with the below-grade tank was removed.

- 7. Following removal of the tank and any liner material, BR will test the soils beneath the BGT as follows:
 - a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
 - b. The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Table I of 19.15.17.13 and the results are attached.

8. If the District Division and/or BR determine there is a release, BR will comply with 19.15.17.13.C.3b.

A release was not determined for the above referenced well.

9. Upon completion of the tank removal, pursuant to 19.15.17.13.C.3c, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and to prevent ponding.

The tank removal area passed all requirements of Table I of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material which included at least one foot of suitable material to establish vegetation at the site.

10. For those portions of the former BGT area no longer required for production activities, BR will seed the disturbed area the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other District Division-approved methods. BR will notify the District Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- Total percent plant cover of at least 70% of pre-disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19.15.17.13.H.5d BR will comply with obligations imposed by other applicable federal or tribal agencies in which there re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

Provision 10 will be accomplished pursuant to 19.15.17.H.5d and notification will be submitted upon completion.

11. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

The former BGT area is not required for production activities and reseeding was completed on 06/01/15 per the procedure noted above.

Closure Report:

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using District Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner and District Division) (Attached)
- Backfilling & cover installation (See Report)
- Confirmation Sampling Analytical Results (Attached)
- Application Rate & Seeding techniques (See Report)
- Photo Documentation of Reclamation (Attached)

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.

	San	na Fe, NM 873	05					
Relea	ase Notifica	ation and Co	orrective A	ction				
		OPERA	TOR	🔲 Initia	al Report	\boxtimes	Final Repor	
Name of Company Burlington Resources Oil LP	& Gas Company	y, Contact Cr	Contact Crystal Walker					
Address 3401 East 30th St, Farmington, NM			No.(505) 326-98	337				
Facility Name: WM Hanley 1		Facility Typ	be: Gas Well					
Surface Owner Private	Mineral Ov	vner Private		API No	.30-045-08	346		
	LOCA	FION OF RE	LEASE					
Unit Letter Section Township Range	Feet from the	North/South Line	Feet from the	East/West Line	County			
L	atitude <u>36.7283</u>	<u>381 N</u> Longitud	e <u>-107.928516 \</u>	W				
	NATI	URE OF REL	EASE					
Type of Release			Volume of Release Volume Recovered					
Source of Release		Date and H	Date and Hour of Occurrence Date and Hour of Discovery					
Was Immediate Notice Given?	No 🛛 Not Req	If YES, To	Whom?					
By Whom?		Date and I	Iour					
Was a Watercourse Reached?	0	If YES, Vo	olume Impacting	the Watercourse.				
If a Watercourse was Impacted, Describe Fully.* N/A								
Describe Cause of Problem and Remedial Action								
No release was encountered during the BGT C	losure.							
,								
Describe Area Affected and Cleanup Action Take	n.*							
N/A								
I hereby certify that the information given above i								
regulations all operators are required to report and public health or the environment. The acceptance								
public health or the environment. The acceptance should their operations have failed to adequately i								

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 healt 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: Launa Jumil	<u>OIL CONSER</u>	VATION DIVISION
Printed Name: Larissa Farrell	Approved by Environmental Special	list:
Title: Regulatory Technician	Approval Date:	Expiration Date:
E-mail Address: Larissa.L.Farrell@cop.com	Attached	
Date: 12-17-15 Phone: (505) 326-9504		

* Attach Additional Sheets If Necessary



March 10, 2014

Crystal Tafoya ConocoPhillips San Juan Business Unit Office 214-05 5525 Hwy 64 Farmington, New Mexico 87401 www.animasenvironmental.com

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

> Durango, Colorado 970-403-3084

Via electronic mail to: <u>SJBUE-Team@ConocoPhillips.com</u>

RE: Below Grade Tank Closure Report WM Hanley #1 San Juan County, New Mexico

Dear Ms. Tafoya:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) WM Hanley #1, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – WM Hanley #1 Legal Description – SE¼ NW¼, Section 18, T29N, R10W, San Juan County, New Mexico Well Latitude/Longitude – N36.72849 and W107.92837, respectively BGT Latitude/Longitude – N36.72829 and W107.92839, respectively Land Jurisdiction –Private Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, February 2014

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 40 based on the following factors:

Crystal Tafoya WM Hanley #1 BGT Closure Report March 10, 2014 Page 2 of 5

- Depth to Groundwater: A water well (SJ 03023), located approximately 1,300 feet west of the location and 40 feet higher in elevation, reported the depth to groundwater at 65 feet below ground surface (bgs). A production pit closure report for the Hanley #2J located at the same well pad reported the depth to groundwater at less than 50 feet bgs. (20 points)
- Wellhead Protection Area: The tank location is not within a wellhead protection area. Peterson Spring is located approximately 2,125 feet northeast of the location. (0 points)
- Distance to Surface Water Body: An unnamed wash which discharges to the wash in Potter Canyon is located approximately 150 feet east of the location. (20 points)

1.3 BGT Closure Assessment

AES was initially contacted by Doyle Clark, CoP representative, on February 13, 2014, and on the same day, Heather Woods and Emilee Skyles of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On February 13, 2014, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for VOCs and chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Screening

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photoionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per U.S. Environmental Protection Agency (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

Crystal Tafoya WM Hanley #1 BGT Closure Report March 10, 2014 Page 3 of 5

conducting soil analyses. Field analytical protocol followed AES's Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1.

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per USEPA Method 8021B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 0.1 ppm in SC-1 up to 2.4 ppm in S-3. Field TPH concentrations ranged from less than 20.0 mg/kg in S-1, S-3 and S-4 up to 35.1 mg/kg in S-5. The field chloride concentration in SC-1 was 60 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Action L	evel (NMAC 19.	15.17.13E)		100	250
S-1	02/13/14	0.5	1.4	<20.0	NA
S-2	02/13/14	0.5	0.2	28.4	NA
S-3	02/13/14	0.5	2.4	<20.0	NA
S-4	02/13/14	0.5	0.7	<20.0	NA
S-5	02/13/14	0.5	0.9	35.1	NA
	02/13/14	0.5	0.1	NA	60

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results
WM Hanley #1 BGT Closure, February 2014

NA - not analyzed

Crystal Tafoya WM Hanley #1 BGT Closure Report March 10, 2014 Paae 4 of 5

Laboratory analytical results for benzene and total BTEX concentrations in SC-1 were reported below the laboratory detection limit of 0.028 mg/kg and 0.139 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. The laboratory analytical report is attached.

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
	NMOCD Ac (NMAC 19.1		0.2	50	1	00	250
SC-1	02/14/14	0.5	<0.028	<0.139	NA	NA	<30

Table 2. Soil Laboratory Analytical Results

INA - not analyzed

3.0 **Conclusions and Recommendations**

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentration reported in S-5 with 35.1 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at WM Hanley #1.

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

Sincerely,

Sinh Sh L

Emilee Skyles Staff Geologist

Elizabeth V McNelly

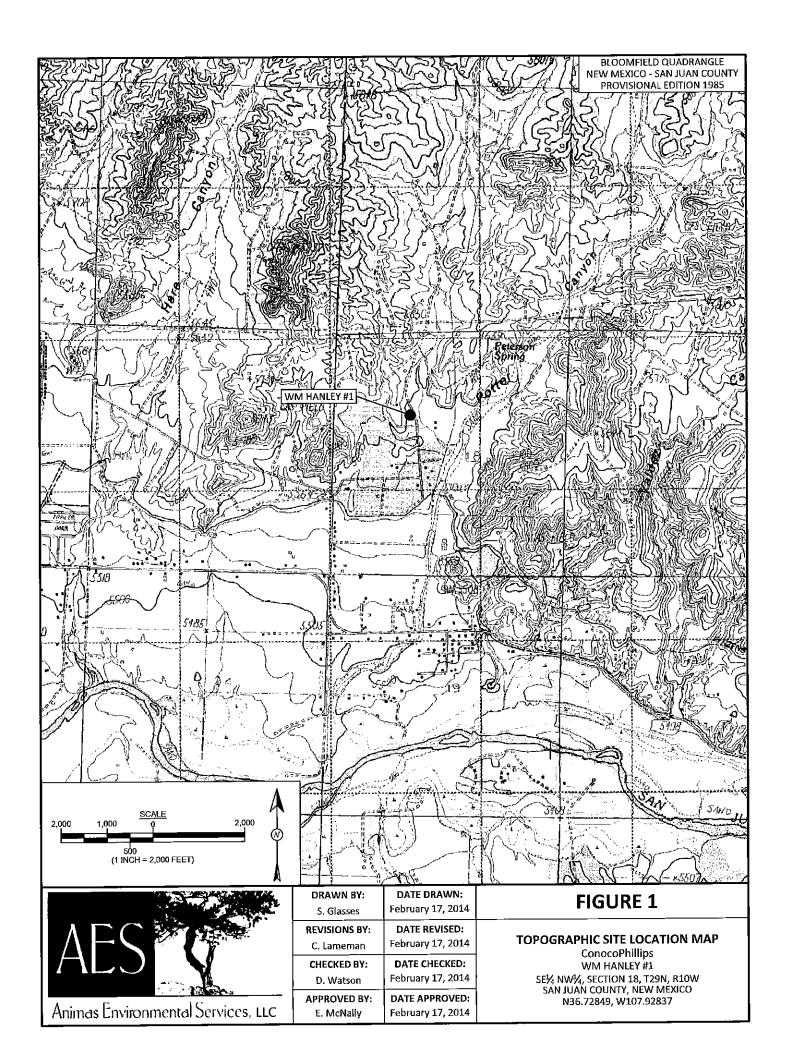
Elizabeth McNally, P.E.

Crystal Tafoya WM Hanley #1 BGT Closure Report March 10, 2014 Page 5 of 5

Attachments:

Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, February 2014 AES Field Screening Report 021314 Hall Analytical Report 1402551

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	S-3 S-4	2/13/14 2/13/14	2.4 0.7	<20.0 <20.0	NA NA	- 	SC-1	2/13/14	<0.028	<0.139	NA	NA	<30	-
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AES Field Screening Report

Client: ConocoPhillips Project Locatior

Date

Matrix: Soil

n: WM Hanley #1	
te: 2/13/2014	
iv. Soil	

AFC	NLU

Animas Environmental Services, LLC

www.animasenvironmental.com

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

Durango, Colorado 970-403-3084

		Time of			Field	Field TPH				HdT
Sample ID	Collection Date	Sample Collection	Sample Location	(mqq)	Chloride (mg/kg)	Analysis Time	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	Analysts Initials
S-1	2/13/2014	12:30	North	1.4	NA	13:22	19.0	20.0	1	EMS
S-2	2/13/2014	12:31	South	0.2	NA	13:24	28.4	20.0	1	EMS
S-3	2/13/2014	12:32	East	2.4	NA	13:27	15.0	20.0	त्त	EMS
S-4	2/13/2014	12:33	West	0.7	NA	13:30	13.7	20.0	1	EMS
S-5	2/13/2014	12:34	Center	6.0	NA	13:34	35.1	20.0	1	EMS
SC-1	2/13/2014	12:36	Composite	0.1	60		Not ,	Not Analyzed for TPH	H	

- **Dilution Factor** Ц
- Not Analyzed ΑN
- Not Detected at the Reporting Limit QN
 - Practical Quantitation Limit PQL

*Field TPH concentrations recorded may be below PQL.

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

Analyst: Sinch Sy L

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

February 18, 2014

Debbie Watson Animas Environmental 624 East Comanche Farmington, NM 87401 TEL: (505) 486-4071 FAX

RE: COP WM Hanley #1

OrderNo.: 1402551

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 2/14/2014 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 <u>www.hallenvironmental.com</u> 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,

andis

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

Hall Environmental Analys	is Labora	tory, Inc.			Analytical Report Lab Order 1402551 Date Reported: 2/18/2	014
CLIENT: Animas Environmental	•	(lient Sam	ple ID: SC	-1	
Project: COP WM Hanley #1			Collection	Date: 2/1	3/2014 12:36:00 PM	[
Lab ID: 1402551-001	Matrix:]	MEOH (SOIL)	Received	Date: 2/1	4/2014 10:30:00 AM	ſ
Analyses	Result	RL Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8021B: VOLATILES					Analy	st: JMP
Benzene	ND	0.028	mg/Kg	1	2/14/2014 11:42:14 A	M R16757
Toluene	ND	0.028	mg/Kg	1	2/14/2014 11:42:14 A	M R16757
Ethylbenzene	ND	0.028	mg/Kg	1	2/14/2014 11:42:14 A	M R16757
Xylenes, Total	ND	0.055	mg/Kg	1	2/14/2014 11:42:14 A	M R16757
Surr: 4-Bromofluorobenzene	88.3	80-120	%REC	1	2/14/2014 11:42:14 A	M R16757
EPA METHOD 300.0: ANIONS					Analy	st: JRR
Chloride	ND	30	mg/Kg	20	2/14/2014 11:44:33 A	M 11733

Dafe 1.1 . 1 J-list fo 4: . info 41 a 10 a,

Refer	to th	e QC Summary report and sample login checkli	ist for flagg	ged QC data and preservation info	rmation.			
Qualifiers:	*	Value exceeds Maximum Contaminant Level.	в	Analyte detected in the associated Metho	od Blank			
	Ε	Value above quantitation range	Н	Holding times for preparation or analysia	s exceeded			
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit	Page 1 of 3			
	0	RSD is greater than RSDlimit	Р	Sample pH greater than 2.				
	R	RPD outside accepted recovery limits	RL					
	S	Spike Recovery outside accepted recovery limits						

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

Client:	Anima	as Environmental
Project:	COP	WM Hanley #1
Sample ID	MB-11733	SamnTyne

Sample ID MB-11733	SampType: MBLK	TestCode: EPA Method	l 300.0: Anions	
Client ID: PBS	Batch ID: 11733	RunNo: 16781		
Prep Date: 2/14/2014	Analysis Date: 2/14/2014	SeqNo: 483050	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride	ND 1.5			
Sample ID LCS-11733	SampType: LCS	TestCode: EPA Method	300.0: Anions	
Sample ID LCS-11733 Client ID: LCSS	SampType: LCS Batch ID: 11733	TestCode: EPA Method RunNo: 16781	300.0: Anions	
Client ID: LCSS	1 57		300.0: Anions Units: mg/Kg	
Client ID: LCSS	Batch ID: 11733 Analysis Date: 2/14/2014	RunNo: 16781		RPDLimit Qual

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
 - P Sample pH greater than 2.
 - RL Reporting Detection Limit

Page 2 of 3

1402551 18-Feb-14

WO#:

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client:	Animas Environmental

COP WM Hanley #1 **Project:** TestCode: EPA Method 8021B: Volatiles Sample ID MB-11715 MK SampType: MBLK RunNo: 16757 Client ID: PBS Batch ID: R16757 Prep Date: 2/13/2014 Analysis Date: 2/14/2014 SeqNo: 482936 Units: mg/Kg SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual Result PQL Analyte ND 0.050 Benzene ND 0.050 Toluene 0.050 Ethylbenzene ND Xylenes, Total ND 0.10 1.000 87.7 80 120 Surr: 4-Bromofluorobenzene 0.88 SampType: LCS TestCode: EPA Method 8021B: Volatiles Sample ID LCS-11715 MK LCSS Batch ID: R16757 RunNo: 16757 Client ID: SeqNo: 482937 Units: mg/Kg Prep Date: 2/13/2014 Analysis Date: 2/14/2014 %REC HighLimit %RPD **RPDL**ímit Qual PQL SPK value SPK Ref Val LowLimit Result Analyte 120 1.000 0 99.8 80 0.050 Benzene 1.0 0.050 1.000 0 105 80 120 Toluene 1.1 0.050 1.000 0 104 80 120 Ethylbenzene 1.0 Xylenes, Total 3.1 0.10 3.000 0 103 80 120 Surr: 4-Bromofiuorobenzene 0.93 1.000 93.4 80 120 TestCode: EPA Method 8021B: Volatiles Sample ID MB-11715 SampType: MBLK Batch ID: 11715 RunNo: 16757 PBS Client ID: Prep Date: 2/13/2014 Analysis Date: 2/14/2014 SeqNo: 482947 Units: %REC PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual Result Analyte 80 120 0.88 1.000 87.7 Surr: 4-Bromofluorobenzene SampType: LCS TestCode: EPA Method 8021B: Volatiles Sample ID LCS-11715 Client ID: LCSS Balch ID: 11715 RunNo: 16757 Analysis Date: 2/14/2014 SeqNo: 482948 Units: %REC Prep Date: 2/13/2014 %RPD RPDLimit Qual SPK value SPK Ref Val %REC Result PQL LowLimit HighLimit Analyte 0.93 1.000 93.4 80 120 Surr: 4-Bromofluorobenzene

Qualifiers:

Value exceeds Maximum Contaminant Level.

Ε Value above quantitation range

- J Analyte detected below quantitation limits
- 0 RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank в
- Holding times for preparation or analysis exceeded Н
- Not Detected at the Reporting Limit ND
- Sample pH greater than 2. Ρ
- Reporting Detection Limit RL

Page 3 of 3

18-Feb-14

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12. Does paperwork match bottle labels? Yes ✓ No ✓	
12. Does paperwork match bottle labels? Yes ✔ No ☐ for pH:	
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13. Are matrices correctly Identified on Chain of Custody? Yes ☑ No □ Adjusted?	
14, Is It clear what analyses were requested? Yes V No	•
15. Were all holding times able to be met? Yes	<u> </u>
<u>Special Handling (if applicable)</u> 16 Was client notified of all discrepancies with this order? Yes No No No NA 🗹	
Person Notified: Date:	-
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Regarding:	
Client Instructions:	

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