District I
1625 N French Dr , Hobbs, NM 88240
District II
1301 W Grand Ave , Artesia, NM 88210
District III
1000 Rio Brazos Rd , 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
July 21, 2008

**For temporary pits, closed-loop sytems, and below-grade tanks**, submit to the appropriate NMOCD District Office

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

# Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

9082

Type of action
- [X] Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
- [ ] Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
- [ ] Modification to an existing permit
- [ ] Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

***Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request***

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances

1
Operator: **ConocoPhillips Company** OGRID#: **217817**
Address: **PO Box 4289, Farmington, NM 87499**
Facility or well name: **San Juan 29-6 Unit 225R**
API Number: **30-039-25267** OCD Permit Number
U/L or Qtr/Qtr: **K(NE/SW)** Section **13** Township: **29N** Range: **6W** County: **Rio Arriba**
Center of Proposed Design: Latitude: **36.72499** °N Longitude: **107.41633** °W NAD. [X] 1927 [ ] 1983
Surface Owner [X] Federal [ ] State [ ] Private [ ] Tribal Trust or Indian Allotment

2
[ ] **Pit:** Subsection F or G of 19 15 17 11 NMAC
Temporary [ ] Drilling [ ] Workover
[ ] Permanent [ ] Emergency [ ] Cavitation [ ] P&A
[ ] 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 ____

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OCT 2011
OIL CONS. DIV. DIST. 3

3
[X] **Closed-loop System:** Subsection H of 19 15 17 11 NMAC
Type of Operation [X] P&A [ ] Drilling a new well [ ] Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
[ ] Drying Pad [X] Above Ground Steel Tanks [ ] Haul-off Bins [ ] Other _____
[ ] Lined [ ] Unlined Liner type Thickness _____ mil [ ] LLDPE [ ] HDPE [ ] PVD [ ] Other _____
Liner Seams [ ] Welded [ ] Factory [ ] Other _____

4
[ ] **Below-grade tank:** Subsection I of 19 15 17 11 NMAC
Volume _____ bbl Type of fluid _____
Tank Construction material _____
[ ] 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 _____

5
[ ] **Alternative Method:**
Submittal of an exception request is required Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval



6

6

**Fencing:** Subsection D of 19 15 17 11 NMAC *(Applies to permanent pit, 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 _____

7

**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)*

8

**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 3 103 NMAC

9

**Administrative Approvals 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.***

☐ Administrative approval(s) Requests must be submitted to the appropriate division district of the Santa Fe Environmental Bureau office for consideration of approval **(Fencing/BGT Liner)**

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

10

**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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau Office for consideration of approval Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance.*** **Siting criteria does not apply to drying pads or above grade-tanks associated with a closed-loop system.**

| | |
|---|---|
| **Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.**<br>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells | ☐ Yes ☐ No |
| **Within 300 feet of a continuously flowing watercourse, or 200 feet of any other watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).**<br>- 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.**<br>*(Applies to temporary, emergency, or cavitation pits and below-grade tanks)*<br>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image | ☐ Yes ☐ No<br>☐ NA |
| **Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.**<br>*(Applied to permanent pits)*<br>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image | ☐ Yes ☐ No<br>☐ NA |
| **Within 500 horizonal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.**<br>- NM Office of the State Engineer - iWATERS database search, 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**<br>- Written confirmation or verification from the municipality, Written approval obtained from the municipality | ☐ Yes ☐ No |
| **Within 500 feet of a wetland.**<br>- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| **Within the area overlying a subsurface mine.**<br>- Written confirmation or verification or map from the NM EMNRD - Mining and Mineral Division | ☐ Yes ☐ No |
| **Within an unstable area.**<br>- 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**<br>- FEMA map | ☐ Yes ☐ No |

11

**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
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19 15 17 10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 15 17 9 NMAC and 19 15 17 13 NMAC

☐ Previously Approved Design (attach copy of design) API _____ or Permit _____

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**Closed-loop Systems 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*

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19 15 17 9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19 15 17 10 NMAC
- ☒ Design Plan - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☒ Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC
- ☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 15 17 9 NMAC and 19 15 17 13 NMAC

☐ Previously Approved Design (attach copy of design) API _____

☐ Previously Approved Operating and Maintenance Plan API _____

13

**Permanent Pits Permit Application Checklist:** Subsection B of 19 15 17 9 NMAC

***Instructions Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19 15 17 9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19 15 17 10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Dike Protection and Structural Integrity Design based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Nuisance or Hazardous Odors, including H2S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19 15 17 9 NMAC and 19 15 17 13 NMAC

14

**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 ☒ Closed-loop System ☐ 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
- ☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

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**Waste Excavation and Removal Closure Plan Checklist:** (19 15 17 13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19 15 17 13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F 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 I of 19 15 17 13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17 13 NMAC

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**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19 15 17 13 D NMAC)
*Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.*

Disposal Facility Name: Envirotech / JFJ Landfarm % IEI — Disposal Facility Permit #: NM-01-0011 / NM-01-0010B

Disposal Facility Name: Basin Disposal Facility — Disposal Facility Permit #: NM-01-005

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please provide the information) ☐ No

*Required for impacted areas which will not be used for future service and operations*
☐ Soil Backfill and Cover Design Specification - based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19 15 17 13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17 13 NMAC

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**Siting Criteria (Regarding on-site closure methods only:** 19 15 17 10 NMAC
*Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19 15 17 10 NMAC for guidance.*

| | |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search, USGS. Data obtained from nearby wells | ☐ Yes ☐ No ☐ N/A |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells | ☐ Yes ☐ No ☐ N/A |
| Ground water is more than 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells | ☐ Yes ☐ No ☐ N/A |
| 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)<br>- 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<br>- Visual inspection (certification) of the proposed site, Aerial photo, satellite image | ☐ Yes ☐ No |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal fee of any other fresh water well or spring, in existence at the time of the initial application<br>- NM Office of the State Engineer - iWATERS database, 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<br>- Written confirmation or verification from the municipality, Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 500 feet of a wetland<br>- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine<br>- Written confiramtion or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area<br>- 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<br>- FEMA map | ☐ Yes ☐ No |

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**On-Site Closure Plan Checklist:** (19 15 17 13 NMAC) ***Instructions: Each of the following items must bee 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 F of 19 15 17 13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19 15 17 11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in place burial of a drying pad) - based upon the appropriate requirements of 19 15 17 11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19 15 17 13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19 15 17 13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17 13 NMAC

19

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief

Name (Print) CRYSTAL TAFOYA Title STAFF REGULATORY TECHNICIAN

Signature Crystal Tafoya Date 10/10/2011

e-mail address crystal.tafoya@conocophillips.com Telephone (505) 326-9837

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**OCD Approval.** [X] Permit Application (including closure plan) [ ] Closure Plan (only) [ ] OCD Conditions (see attachment)

**OCD Representative Signature:** Donald D. Kelly **Approval Date:** 10/11/2011

**Title:** Compliance Officer **OCD Permit Number:**

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**Closure Report (required within 60 days of closure completion):** Subsection K of 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:**

22

**Closure Method:**

[ ] Waste Excavation and Removal [ ] On-site Closure Method [ ] Alternative Closure Method [ ] Waste Removal (Closed-loop systems only)

[ ] If different from approved plan, please explain

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**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only.**

***Instructions Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed Use attachment if more than two facilities were utilized***

Disposal Facility Name Disposal Facility Permit Number

Disposal Facility Name Disposal Facility Permit Number

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and opeartions?

[ ] Yes (If yes, please demonstrate complilane to the items below) [ ] No

*Required for impacted areas which will not be used for future service and operations*

[ ] Site Reclamation (Photo Documentation)

[ ] Soil Backfilling and Cover Installation

[ ] Re-vegetation Application Rates and Seeding Technique

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**Closure Report Attachment Checklist:** ***Instructions· Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached***

[ ] Proof of Closure Notice (surface owner and division)

[ ] Proof of Deed Notice (required for on-site closure)

[ ] Plot Plan (for on-site closures and temporary pits)

[ ] Confirmation Sampling Analytical Results (if applicable)

[ ] Waste Material Sampling Analytical Results (if applicable)

[ ] Disposal Facility Name and Permit Number

[ ] Soil Backfilling and Cover Installation

[ ] Re-vegetation Application Rates and Seeding Technique

[ ] Site Reclamation (Photo Documentation)

On-site Closure Location Latitude Longitude NAD [ ] 1927 [ ] 1983

25

**Operator Closure Certification:**

*I hereby certify that the information and attachments submitted with this closure report is ture, 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) Title

Signature Date

e-mail address Telephone

# ConocoPhillips Company
# Closed-loop Plans

## Closed–loop Design Plan

COPC's closed loop system will not entail a drying pad, temporary pit, below grade tank or sump. It will include an above ground tank suitable for holding the cuttings and fluids for rig operations. The tank will be sufficient volume to maintain a safe free board between disposal of the liquids and solids from rig operations.

1. Fencing is not required for an above ground closed-loop system
2. It will be signed in compliance with 19.15.3.103 NMAC
3. A frac tank will be on location to store fresh water

## Closed-loop Operating and Maintenance Plan

COPC's closed-loop tank will be operated and maintained to contain liquids and solids in order to prevent contamination of fresh water sources, in order to protect public health and the environment. To ensure the operation is maintained the following steps will be followed:

1. The liquids will be vacuumed out and disposed of at the Basin Disposal facility (Permit # NM-01-005) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B). Solids in the closed-loop tank will be vacuumed out and disposed of at Envirotech (Permit # NM-01-0011) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) on a periodic basis to prevent over topping.
2. No hazardous waste, miscellaneous solid waste or debris will be discharged into or stored in the tank. Only fluids or cutting used or generated by rig operations will be placed or stored in the tank.
3. The division district office will be notified within 48 hours of the discovery of compromised integrity of the closed-loop tank. Upon the discovery of the compromised tank, repairs will be enacted immediately

## Closed-loop Closure Plan

The closed-loop tank will be closed in accordance with 19.15.17.13. This will be done by transporting cuttings and all remaining sludges to Envirotech (Permit # NM-01-0011) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) immediately following rig operations. All remaining liquids will be transported and disposed of in the Basin Disposal facility (Permit # NM-01-005) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B). The tanks will be removed from the location as part of the rig move. At time of well abandonment, the site will be reclaimed and re-vegetated to pre-existing conditions when possible.