

District I  
1625 N French Dr, Hobbs, NM 88240  
District II  
1301 W Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S St Francis Dr, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
38

Form C-144  
July 21, 2008

For temporary pits, closed-loop systems, 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.

9293  
**Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application**

Type of action. ☒ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
Existing BGT ☒ 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 XTO Energy, Inc OGRID # 5380  
Address #382 County Road 3100, Aztec, NM 87410  
Facility or well name ROPCO 7 #1  
API Number 30-045-30523 OCD Permit Number \_\_\_\_\_  
U/L or Qtr/Qtr B Section 07 Township 29N Range 14W County San Juan  
Center of Proposed Design Latitude 36 745184 Longitude 108 34853 NAD ☐ 1927 ☒ 1983  
Surface Owner ☒ 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 \_\_\_\_\_  
RCVD DEC 7 '11  
OIL CONS. DIV.  
DIST. 3

3.  
☐ **Closed-loop System:** Subsection H of 19 15.17 11 NMAC  
Type of Operation. ☐ 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 ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other \_\_\_\_\_  
☐ Lined ☐ Unlined Liner type Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
Liner Seams. ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_

4  
☒ **Below-grade tank:** Subsection I of 19 15 17 11 NMAC  
Volume 21 bbl Type of fluid Produced Water  
Tank Construction material Steel  
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Visible sidewalls, vaulted, automatic high-level shut off, no liner  
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.

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**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 Four foot height, steel mesh field fence (hogwire) with pipe top railing

7

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

- ☐ Screen ☐ Netting ☒ Other Expanded metal or solid vaulted top
- ☐ 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

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**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 or the Santa Fe Environmental Bureau office for consideration of approval.
- ☐ 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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	
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)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i> )	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to permanent pits</i> )	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input checked="" type="checkbox"/> NA
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 feet of any other fresh water well or spring, in existence at the time of initial application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Within 500 feet of a wetland.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	
Within the area overlying a subsurface mine.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	
Within an unstable area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS; NM Geological Society; Topographic map	
Within a 100-year floodplain	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- FEMA map	

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 NMAC  
☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☒ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☒ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

12.

**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 Number. \_\_\_\_\_

☐ Previously Approved Operating and Maintenance Plan API Number \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

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 H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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 Burial  
☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**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: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

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 below) ☐ No

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

☐ 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

17

**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 - NM Office of the State Engineer - iWATERS database search; USGS, Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS, Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS, Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 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 feet of any other fresh water well or spring, in existence at the time of initial application - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map, Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geological Society, Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. / - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

18

**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 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) Kim Champlin Title: Environmental Representative  
 Signature: Kim Champlin Date: 11-26-08  
 e-mail address kim\_champlin@xtoenergy.com Telephone: (505) 333-3100

20.

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

OCD Representative Signature: [Signature] Approval Date: 1/2/2012  
 Title: Environmental Engineer Compliance Officer  
 OCD Permit Number: \_\_\_\_\_

21.

**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: 10/4/11

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.

23.

**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 operations?

☐ Yes (If yes, please demonstrate compliance 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

24.

**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 (required for on-site closure)  
☒ Disposal Facility Name and Permit Number  
☒ Soil Backfilling and Cover Installation  
☒ Re-vegetation Application Rates and Seeding Technique  
☒ Site Reclamation (Photo Documentation)

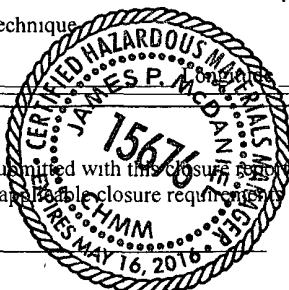
On-site Closure Location: Latitude \_\_\_\_\_ NAD ☐ 1927 ☐ 1983

25.

**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) James McDaniel Title: EHS Supervisor  
 Signature: [Signature] Date: 12/5/11  
 e-mail address: James.McDaniel@xtoenergy.com Telephone: 505-333-3701



District I  
1625 N French Dr , Hobbs, NM 88240  
District II  
1301 W Grand Avenue, Artesia, NM 88210  
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1000 Rio Brazos Road, Aztec, NM 87410  
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1220 S St Francis Dr , Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: XTO Energy, Inc.	Contact: James McDaniel	
Address: 382 Road 3100, Aztec, New Mexico 87410	Telephone No.: (505) 333-3701	
Facility Name: ROPCO 7 #1 (30-045-30523)	Facility Type: Gas Well	
Surface Owner: Federal	Mineral Owner:	Lease No :

#### LOCATION OF RELEASE

Unit Letter B	Section 7	Township 29N	Range 14W	Feet from the 1254	North/South Line FNL	Feet from the 1939	East/West Line FEL	County San Juan
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Latitude: 36.745184 Longitude: -108.34853

#### NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: Unknown	Volume Recovered: None
Source of Release: Below Grade Tank	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 9/1/2011
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse	

If a Watercourse was Impacted, Describe Fully \*

Describe Cause of Problem and Remedial Action Taken \*

The below grade tank was taken out of service at the ROPCO 7 #1 well site due to the plugging and abandoning of this well site. A composite sample was collected beneath the location of the on-site BGT, and submitted for laboratory analysis for TPH via USEPA Method 418.1 and 8015, benzene and BTEX via USEPA Method 8021, and for total chlorides. The sample returned results below the 'Pit Rule' spill confirmation standards for benzene, total BTEX and TPH, but above the 250 ppm chloride standard at 10,000 ppm, confirming that a release has occurred at this location. The site was then ranked according to the NMOCD Guidelines for the Remediation of Leaks, Spills and Releases. The site was ranked a 30 due to a depth to groundwater of approximately 40' below ground surface based on local water well data, and a distance to a nearby was at less than 1,000 feet. This set the closure standard to 100 ppm TPH, 10 ppm benzene, and 50 ppm total BTEX.

Describe Area Affected and Cleanup Action Taken \*

A release was confirmed in regards to this below grade tank.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

#### OIL CONSERVATION DIVISION

Signature

Printed Name: James McDaniel, CHMM #15676

Title: EH&S Supervisor

E-mail Address: James\_McDaniel@xtoenergy.com

Date: 12/5/2011

Phone: 505-333-3701

Approved by District Supervisor

Approval Date

Expiration Date

Conditions of Approval.

Attached ☐

\* Attach Additional Sheets If Necessary

# **XTO Energy Inc. San Juan Basin Below Grade Tank Closure Report**

**Lease Name: ROPCO 7 #1**

**API No.: 30-045-30523**

**Description: Unit B, Section 7, Township 29N, Range 14W, San Juan County**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on XTO Energy Inc. (XTO) locations. This is XTO's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

## **General Plan**

1. XTO will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.

**Closure Date is October 4, 2011**

2. XTO will close a below-grade tank that does 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 after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.

**Closure Date is October 4, 2011**

3. XTO will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.

**Required C-144 Form is attached to this document.**

4. XTO will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:

Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B

Soil contaminated by exempt petroleum hydrocarbons

Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes

Basin Disposal Permit No. NM01-005

Produced water

**All liquids and sludge were removed from the tank prior to closure activities.**

5. XTO will 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. **XTO has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.**

6. XTO will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.

**XTO has removed all equipment associated with the ROPCO 7 #1 well site due to the plugging and abandoning of this well location.**

7. XTO will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. XTO will notify the division of its results on form C-141.

**A five point composite sample was taken of the pit using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)( 1 )(b). (Sample results attached).**

Components	Test Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.047 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.236 mg/kg
TPH	EPA SW-846 418.1	100	45 mg/kg
Chlorides	EPA 300 1	250 or background	10000 mg/kg

8. If XTO or the division determines that a release has occurred, XTO will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.

**Due to a chloride results of 10,000 ppm, a release has been confirmed for this location. A C-141 Release Notification form will be sent outlining any remediation activities taken regarding this release.**

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, XTO will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.

**The pit cellar was backfilled using compacted, non-waste containing earthen material, with a division prescribed soil cover.**

10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.

The notification will include the following:

- i. Operator's name
- ii. Well Name and API Number
- iii. Location by Unit Letter, Section, Township, and Range

**Notification was provided to Mr. Brandon Powell with the Aztec office of the OCD via email on September 27, 2011; see attached email printout.**



11. The surface owner shall be notified of XTO's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.  
**The surface owner was notified on September 27, 2011; see attached letter and return receipt.**
12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.  
**The location has been recontoured to match the above specifications.**
13. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.  
**The site has been backfilled to match these specifications.**
14. XTO will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.  
**This location will be reclaimed pursuant to the BLM MOU.**
15. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
  - i. Proof of closure notice to division and surface owner; **attached**
  - ii. Details on capping and covering, where applicable; **per OCD Specifications**
  - iii. Inspection reports; **attached**
  - iv. Confirmation sampling analytical results; **attached**
  - v. Disposal facility name(s) and permit number(s); **see above**
  - vi. Soil backfilling and cover installation; **per OCD Specifications**
  - vii. Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **attached**
  - viii. Photo documentation of the site reclamation. **attached**



## COVER LETTER

Thursday, September 01, 2011

James McDaniel  
XTO Energy  
382 County Road 3100  
Aztec, NM 87410

TEL: (505) 333-3100  
FAX (505) 333-3280

RE: ROPCO 7 #1

Order No.: 1108846

Dear James McDaniel:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 8/20/2011 for the analyses presented in the following report.

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

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

Sincerely,

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

Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901  
AZ license # AZ0682

**Hall Environmental Analysis Laboratory, Inc.**

Date: 01-Sep-11

**Analytical Report**

**CLIENT:** XTO Energy  
**Lab Order:** 1108846  
**Project:** ROPCO 7 #1  
**Lab ID:** 1108846-01

**Client Sample ID:** BGT  
**Collection Date:** 8/18/2011 9:15:00 AM  
**Date Received:** 8/20/2011  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: JB
Diesel Range Organics (DRO)	14	10		mg/Kg	1	8/29/2011 5:08:21 AM
Surr: DNOP	99.2	73 4-123		%REC	1	8/29/2011 5:08:21 AM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: RAA
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	8/26/2011 6:15:48 PM
Surr: BFB	117	75 2-136		%REC	1	8/26/2011 6:15:48 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: RAA
Benzene	ND	0.047		mg/Kg	1	8/26/2011 6:15:48 PM
Toluene	ND	0.047		mg/Kg	1	8/26/2011 6:15:48 PM
Ethylbenzene	ND	0.047		mg/Kg	1	8/26/2011 6:15:48 PM
Xylenes, Total	ND	0.095		mg/Kg	1	8/26/2011 6:15:48 PM
Surr: 4-Bromofluorobenzene	92.3	80-120		%REC	1	8/26/2011 6:15:48 PM
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: SRM
Chloride	10000	750		mg/Kg	500	8/26/2011 9:40:13 AM
<b>EPA METHOD 418.1: TPH</b>						Analyst: JB
Petroleum Hydrocarbons, TR	45	20		mg/Kg	1	8/24/2011

**Qualifiers:**

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

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

## QA/QC SUMMARY REPORT

Client: XTO Energy  
Project: ROPCO 7 #1

Work Order: 1108846

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: Anions											
Sample ID: MB-28181		MBLK				Batch ID:	28181	Analysis Date:	8/24/2011 12:58:25 PM		
Chloride	ND	mg/Kg	1.5								
Sample ID: LCS-28181		LCS				Batch ID:	28181	Analysis Date:	8/24/2011 1:15:49 PM		
Chloride	14.19	mg/Kg	1.5	15	0	94.6	90	110			
Method: EPA Method 418.1: TPH											
Sample ID: MB-28160		MBLK				Batch ID:	28160	Analysis Date:	8/24/2011		
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-28160		LCS				Batch ID:	28160	Analysis Date:	8/24/2011		
Petroleum Hydrocarbons, TR	100.6	mg/Kg	20	100	0	101	87.8	115			
Sample ID: LCSD-28160		LCSD				Batch ID:	28160	Analysis Date:	8/24/2011		
Petroleum Hydrocarbons, TR	101.8	mg/Kg	20	100	0	102	87.8	115	1.26	8.04	
Method: EPA Method 8015B: Diesel Range Organics											
Sample ID: MB-28158		MBLK				Batch ID:	28158	Analysis Date:	8/25/2011 7:11:01 PM		
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-28158		LCS				Batch ID:	28158	Analysis Date:	8/25/2011 7:45:06 PM		
Diesel Range Organics (DRO)	50.11	mg/Kg	10	50	0	100	66.7	119			
Sample ID: LCSD-28158		LCSD				Batch ID:	28158	Analysis Date:	8/25/2011 8:19:17 PM		
Diesel Range Organics (DRO)	51.66	mg/Kg	10	50	0	103	66.7	119	3.06	18.9	
Method: EPA Method 8015B: Gasoline Range											
Sample ID: MB-28146		MBLK				Batch ID:	28146	Analysis Date:	8/24/2011 1:25:44 PM		
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-28146		LCS				Batch ID:	28146	Analysis Date:	8/24/2011 12:25:39 PM		
Gasoline Range Organics (GRO)	31.26	mg/Kg	5.0	25	0	125	86.4	132			
Method: EPA Method 8021B: Volatiles											
Sample ID: MB-28146		MBLK				Batch ID:	28146	Analysis Date:	8/24/2011 1:25:44 PM		
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: LCS-28146		LCS				Batch ID:	28146	Analysis Date:	8/24/2011 12:55:37 PM		
Benzene	0.8810	mg/Kg	0.050	1	0.0238	85.7	83.3	107			
Toluene	0.8318	mg/Kg	0.050	1	0.0145	81.7	74.3	115			
Ethylbenzene	0.9328	mg/Kg	0.050	1	0.0216	91.1	80.9	122			
Xylenes, Total	2.939	mg/Kg	0.10	3	0.0516	96.3	85.2	123			

## Qualifiers:

E Estimated value  
J Analyte detected below quantitation limits  
ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded  
NC Non-Chlorinated  
R RPD outside accepted recovery limits

# Hall Environmental Analysis Laboratory, Inc.

## Sample Receipt Checklist

Client Name XTO ENERGY

Date Received:

8/20/2011

Work Order Number 1108846

Received by.

AMF

Checklist completed by

Signature

Date

Sample ID labels checked by.

Initials

Matrix

Carrier name Greyhound

Shipping container/cooler in good condition?

Yes ☒

No ☐

Not Present ☐

Custody seals intact on shipping container/cooler?

Yes ☒

No ☐

Not Present ☐

Not Shipped ☐

Custody seals intact on sample bottles?

Yes ☐

No ☐

N/A ☒

Chain of custody present?

Yes ☒

No ☐

Chain of custody signed when relinquished and received?

Yes ☒

No ☐

Chain of custody agrees with sample labels?

Yes ☒

No ☐

Samples in proper container/bottle?

Yes ☒

No ☐

Sample containers intact?

Yes ☒

No ☐

Sufficient sample volume for indicated test?

Yes ☒

No ☐

All samples received within holding time?

Yes ☒

No ☐

Water - VOA vials have zero headspace?

No VOA vials submitted ☒

Yes ☒

No ☒

Water - Preservation labels on bottle and cap match?

Yes ☐

No ☒

N/A ☐

Water - pH acceptable upon receipt?

Yes ☐

No ☒

N/A ☐

Container/Temp Blank temperature?

<6° C Acceptable

If given sufficient time to cool.

Number of preserved  
bottles checked for  
pH

<2 >12 unless noted  
below.

COMMENTS:

Client contacted

Date contacted.

Person contacted

Contacted by:

Regarding

Comments:

Corrective Action

<b>Chain-of-Custody Record</b>		Turn-Around Time:	
Client: <u>XTO</u>		<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Rush	
Mailing Address: <u>390 CR 3100</u>		Project Name: <u>Popco 7 #1</u>	
<u>AZTEC, NM 87410</u>		Project #:	
Phone #: <u>787-0519</u>		Project Manager:	
email or Fax#: <u>james-mcdonnel@xtoenergy.com</u>		<u>JAMES McDONNELL</u>	
QA/QC Package:			
<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Level 4 (Full Validation)			
Accreditation		Sampler: <u>JOSLY RICHNER</u>	
<input type="checkbox"/> NELAP <input type="checkbox"/> Other		On Ice: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> EDD (Type)		Sample Temperature: <u>33</u>	

☒ Standard      ☐ Rush

Loco 7 #1

Project #:

**Project Manager:**

JAMES MCORRICK

**Sampler:**

Josh Rechner

## On Ice



Sample Temperature

[illegible]

Date:	Time	Relinquished by:
-------	------	------------------

GA-11

Rek

Relinquished by:

10/11

Received by:

Ch. J. White

Date	Time
------	------

8/19/17 174-

Remarks:

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Relinquished by: \_\_\_\_\_

841

1

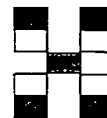
Relinquished by:

01.11.11

Received by:

9

Date	Time
------	------



## HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975      Fax 505-345-4107

## Analysis Request

[illegible]

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.



James McDaniel /FAR/CTOC  
09/27/2011 10:45 AM

To Mark\_Kelly@blm.gov  
cc  
bcc  
Subject BGT Closures

Mark,

Please accept this email as the required notification of BGT closure activities occurring at the locations listed below. These BGTs are being closed due to the plugging and abandoning of these well locations.

J C Davidson C #1 - 3004507126 - Sec 28, Twn 28N, Rge 10W, San Juan County, New Mexico  
ROPCO 7 #1 - 3004530523 - Sec 7, Twn 29N, Rge 14W, San Juan County, New Mexico  
Hubbell Gas COM #2S - 3004532776 - Sec 29, Twn 28N, Rge 10W, San Juan County, New Mexico

Thank you for your time in regards to this matter.



*James McDaniel, CHMM #15676*  
**EH&S Supervisor**  
**XTO Energy, Inc.**  
Office # 505-333-3701  
Cell # 505-787-0519  
James.Mcdaniel@xtoenergy.com



James McDaniel /FAR/CTOC

09/27/2011 10:43 AM

To brandon.powell@state.nm.us

cc

bcc

Subject BGT Closure Notifications

Brandon,

Please accept this email as the required notification of BGT closure activities occurring at the locations listed below. These BGTs are being closed due to the plugging and abandoning of these well locations.

J C Davidson C #1 - 3004507126 - Sec 28, Twn 28N, Rge 10W, San Juan County, New Mexico

ROPCO 7 #1 - 3004530523 - Sec 7, Twn 29N, Rge 14W, San Juan County, New Mexico

Hubbell Gas COM #2S - 3004532776 - Sec 29, Twn 28N, Rge 10W, San Juan County, New Mexico

Thank you for your time in regards to this matter.



*James McDaniel, CHMM #15676*

**EH&S Supervisor**

**XTO Energy, Inc.**

Office # 505-333-3701

Cell # 505-787-0519

James.Mcdaniel@xtoenergy.com



XTO Energy, Inc.  
ROPCO 7 #1  
Section 7, Township 29N, Range 14W  
Closure Date: 10/4/2011



Photo 1: ROPCO 7 #1 after Reclamation (View 1)

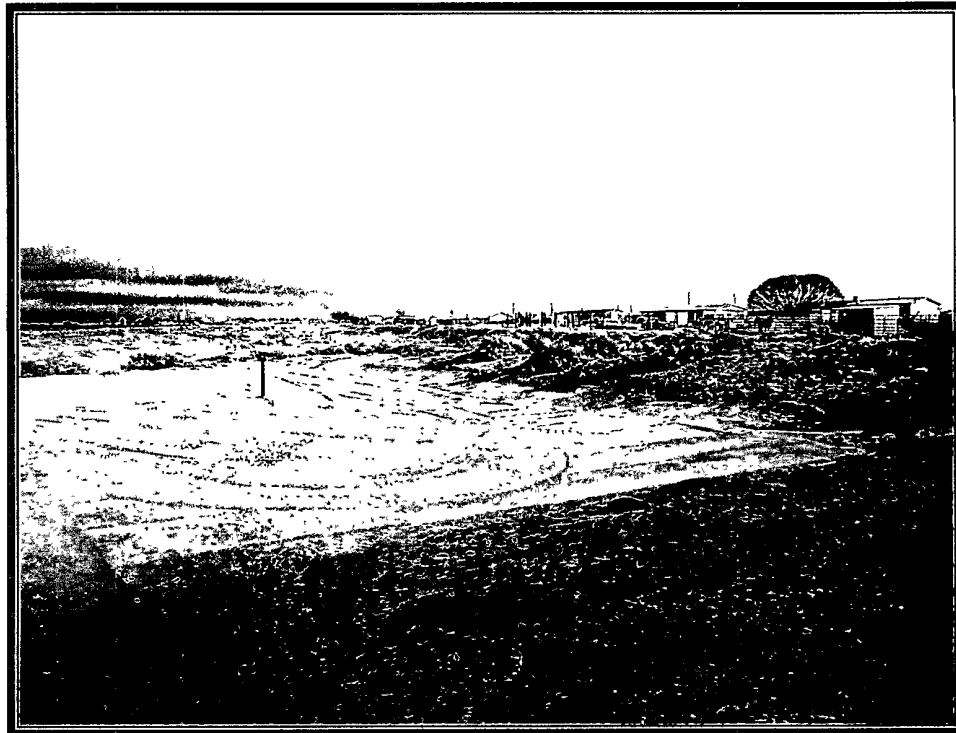


Photo 2: ROPCO 7 #1 after Reclamation (View 2)



# Well Below Tank Inspection Report

RouteName		StopName	Pumper	Foreman	WellName	APIWellNumber			Section	Range	Township
FAR NM Run 69		ROPCO 07 001	Martin, Eugene	Morrow, Pete	ROPCO 07 01 (PA)	3004530523			7	14W	29N
InspectorName	Inspection Date	Inspection Time	Visible LinerTears	VisibleTankLeak Overflow	Collection OfSurfaceRun	Visible LayerOil	Visible Leak	Freeboard EstFT	PitLocation	PitType	Notes
BJ Perry	08/25/2008	14 00	No	No	No	No	No	6			
BJ Perry	09/16/2008	12 35	No	No	No	No	No	6			
BJ Perry	10/30/2008	12 00	No	No	No	No	No	6			
BJ Perry	02/06/2009	12 00	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	05/30/2009	09 40	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	01/30/2010	10 00	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	05/03/2010	10 45	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	06/11/2010	09 00	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	08/28/2010	10 00	No	No	No	No	No	6	Well Water Pit	Below Ground	
gene martin	12/21/2010	09 00	No	No	No	No	No	6	Well Water Pit	Below Ground	well inactive