1625 N French Dr , Hobbs, NM 88240

State of New Mexico Energy Minerals and Natural Resources

Form C-144 July 21, 2008

District II 1301 W Grand Ave , Artesia, NM 88210 District III

Department Oil Conservation Division 1220 South St. Francis Dr. For temporary pits, closed-loop sytems, and below-grade tanks, submit to the appropriate NMOCD District Office

1000 Rio Biazos Rd , Aztec, NM 87410 <u>District IV</u> 1220 S St Francis Di , Santa Fe, NM 87505	Santa Fe, NM 87505	For permanent pits and exceptions submit to the Santa Environmental Bureau office and provide a copy to the appropriate NMOCD District Office	. Fe
	osed-Loop System, Below	v-Grade Tank, or	
		or Closure Plan Application	
773 Type of action: X Perm	it of a nit-closed-loop system, below	v-grade tank, or proposed alternative method	
		w-grade tank, or proposed alternative method	
	fication to an existing permit	w-grade tank, or proposed atternative method	
<u></u>	01	ng permitted or non-permitted pit, closed-loop system,	
	v-grade tank, or proposed alternative		
Instructions: Please submit one application	(Form C-144) per individual pit, cl	losed-loop system, below-grade tank or alternative requ	iest
Please be advised that approval of this request	does not relieve the operator of liability should of	operations result in pollution of surface water, ground water or the	
environment Nor does approval relieve the operate	or of its responsibility to comply with any other	r applicable governmental authority's rules, regulations or ordinances	
1 Operator ConocoPhillips Company		OGRID# 21781 7	
Address: PO Box 4289, Farmington, NM 87		OURID# 21/81/	
Facility or well name San Juan 29-6 Unit 20			
<u></u>			
API Number 30-039-076		nit Number	[
U/L or Qtr/Qtr K(NE/SW) Section 8	Township. 29N Rang	·	
Center of Proposed Design. Latitude.	36.737419 °N Longitud		1983
Surface Owner X Federal St	ate Private Tribal Trust	or Indian Allotment	
2		RCVD MAR 13	717
Pit: Subsection F or G of 19 15 17 11 NMAC			ı
Temporary Drilling Workover		OIL CONS. D	W.
Permanent Emergency Cavitation	P&A	DIST. 3	
Lined Unlined Liner type	Thickness mil LLE	DPE HDPE PVC Other	
String-Reinforced			
Liner Seams Welded Factory	Other Volume	bbl Dimensions Lx Wx D	
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 (A	Applies to activities which require prior approval of a permit or	
	notice of intent)		Ì
Drying Pad X Above Ground Steel Ta	L_1		
Lined Unlined Liner type	ThicknessmilLLD	PE HDPE PVD Other	
Liner Scams Welded Factory	Other		
4			
Below-grade tank: Subsection I of 19 15 17	7 11 NMAC		
Volumebbl Ty	pe of fluid		
Tank Construction material			
Secondary containment with leak detection	Visible sidewalls, liner, 6-inch lift	t and automatic overflow shut-off	
Visible sidewalls and liner Visi	ble sidewalls onlyOther		
Liner Type Thicknessmil	HDPE PVC C	Other	
5			
Alternative Method:			
Submittal of an exception request is required Exce	eptions must be submitted to the Santa Fe	Environmental Bureau office for consideration of approval	

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, ins. Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate Please specify	titution or church)
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)	
Signs: Subsection C of 19 15 17 11 NMAC 12" X 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers X Signed in compliance with 19 15 3 103 NMAC	
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 cons (Fencing/BGT Liner) Exception(s) Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval	aderation of approval
Stting 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. - 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). - 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.	Yes No
(Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	□NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applied to permanent pits) - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	Yes No
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.	Yes 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 - Written confirmation or verification from the municipality, Written approval obtained from the municipality	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
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

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			
12 Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19 15 17 9 NMAC			
Instructions Lach 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			
X Design Plan - based upon the appropriate requirements of 19 15 17 11 NMAC			
X Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC			
X 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 (I) 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			
Critified 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 Nutsance 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 X P&A Permanent Pit Below-grade Tank X Closed-loop System			
Alternative			
Proposed Closure Method Waste Excavation and Removal			
X Waste Removal (Closed-loop systems only)			
On-site Closure Method (only for temporary pits and closed-loop systems)			
In-place Burnal On-site Trench			
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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16 Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19 Instructions Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attach			
facilities are required	•		
Disposal Facility Name Envirotech / JFJ Landfarm / IEI Disposal Facility Permit # NM-			
Disposal Facility Name Basin Disposal Facility Disposal Facility Permit # NM-Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not			
Yes (If yes, please provide the information No Required for impacted areas which will not be used for future service and operations	The used for future service and		
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			
String Criteria (Regarding on-site closure methods only: 19 15 17 10 NMAC Instructions Each string criteria requires a demonstration of compliance in the closure plan Recommendations of acceptable source certain string criteria may require administrative approval from the appropriate district office or may be considered an exception who office for consideration of approval - Justifications and/or demonstrations of equivalency are required. Please refer to 19 15 17 10 N	ich must be submitted to the Santa I'e Environmental Bureai		
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	Yes No		
Ground water is between 50 and 100 feet below the bottom of the buried waste	☐ Yes ☐ No		
- NM Office of the State Engineer - tWATERS database search, USGS, Data obtained from nearby wells	⊟N/A		
Ground water is more than 100 feet below the bottom of the buried waste	Yes No		
- NM Office of the State Engineer - tWATERS database search, USGS, Data obtained from nearby wells	□N/A		
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, (measured from the ordinary high-water mark)	or playa lake Yes 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. - Visual inspection (certification) of the proposed site, Aerial photo, satellite image			
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or purposes, or within 1000 horizontal fee 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, Visual inspection (certification) of the proposed site.	- I		
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ord pursuant to NMSA 1978, Section 3-27-3, as amended	inance adopted Yes No		
 Written confirmation or verification from the municipality, Written approval obtained from the municipality Within 500 feet of a wetland 	☐Yes ☐No		
- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed s			
Within the area overlying a subsurface mine	Yes No		
- Written confirantion or verification or map from the NM EMNRD-Mining and Mineral Division Within an unstable area	Yes No		
- Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geologi			
Topographic map			
Within a 100-year floodplain - FEMA map	Yes No		
On-Site Closure Plan Checklist: (19 15 17 13 NMAC) Instructions: Each of the following items must bee a by a check mark in the box, that the documents are attached.	nttached to the closure plan. Please indicate,		
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19 15 17 10 NM	IAC		
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			
Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site			
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			

Form C-144

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) Dollie L. Bysse Title Staff Regulatory Technician
Signature Date 3/12/12
e-mail address dollie I busse@conocophillips com Telephone 505-324-6104
20 OCD A
OCD Approval: Permit Application (including albsure plan) Closure Plan (only) OCD Conditions (see attachment)
OCD Representative Signature: Approval Date: 4/3/2012
Title: Compinace Office OCD Permit Number:
THE CONTRACTOR OCCUPANTION OCC
Closure Report (required within 60 days of closure completion): 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
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 compliane to the items below)
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 (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
the closure complies with all applicable closure requirements and conditions specified in the approved closure plan

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.