

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

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

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
- ☐ 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 28-7 UNIT 131N

API Number: 30-039-30663 OCD Permit Number: _____

U/L or Qtr/Qtr: C(NE/NW) Section: 34 Township: 28N Range: 7W County: Rio Arriba

Center of Proposed Design: Latitude: 36.62361 °N Longitude: 107.56301 °W 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 JUL 24 '12
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: (PRE-SET)

☐ 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 | <p>Fencing: Subsection D of 19 15 17 11 NMAC (<i>Applies to permanent pit, temporary pits and below-grade tanks</i>)</p> <p><input type="checkbox"/> Chain link, six feet in height, two strands of barbed wire at top (<i>Required if located within 1000 feet of a permanent residence, school, hospital, institution or church</i>)</p> <p><input type="checkbox"/> Four foot height four strands of barbed wire evenly spaced between one and four feet</p> <p><input type="checkbox"/> Alternate Please specify _____</p> | | | | | | | | | | | | | | | | | | | | |
| 7 | <p>Netting: Subsection E of 19 15 17 11 NMAC (<i>Applies to permanent pits and permanent open top tanks</i>)</p> <p><input type="checkbox"/> Screen <input type="checkbox"/> Netting <input type="checkbox"/> Other _____</p> <p><input type="checkbox"/> Monthly inspections (<i>If netting or screening is not physically feasible</i>)</p> | | | | | | | | | | | | | | | | | | | | |
| 8 | <p>Signs: Subsection C. of 19 15 17 11 NMAC</p> <p><input type="checkbox"/> 12" X 24", 2" lettering, providing Operator's name site location and emergency telephone numbers</p> <p><input checked="" type="checkbox"/> Signed in compliance with 19 15 3 103 NMAC.</p> | | | | | | | | | | | | | | | | | | | | |
| 9 | <p>Administrative Approvals and Exceptions:</p> <p>Justifications and/or demonstrations of equivalency are required Please refer to 19 15 17 NMAC for guidance</p> <p><i>Please check a box if one or more of the following is requested, if not leave blank:</i></p> <p><input checked="" type="checkbox"/> Administrative approval(s) Requests must be submitted to the appropriate division district of the Santa Fe Environmental Bureau office for consideration of approval (Closed Loop Pre-set)</p> <p><input type="checkbox"/> Exception(s) Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval</p> | | | | | | | | | | | | | | | | | | | | |
| 10 | <p>Siting Criteria (regarding permitting) 19 15 17 10 NMAC</p> <p><i>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 driving pads or above grade-tanks associated with a closed-loop system.</i></p> <table style="width: 100%;"> <tr> <td style="width: 80%;"> <p>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.</p> <p>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells</p> </td> <td style="width: 20%; text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>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).</p> <p>- Topographic map, Visual inspection (certification) of the proposed site</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA </td> </tr> <tr> <td> <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applied to permanent pits</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA </td> </tr> <tr> <td> <p>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.</p> <p>- NM Office of the State Engineer - iWATERS database search, Visual inspection (certification) of the proposed site</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>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</p> <p>- Written confirmation or verification from the municipality. Written approval obtained from the municipality</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>Within 500 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>Within the area overlying a subsurface mine.</p> <p>- Written confirmation or verification or map from the NM EMNRD - Mining and Mineral Division</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>Within an unstable area.</p> <p>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society, Topographic map</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> <tr> <td> <p>Within a 100-year floodplain</p> <p>- FEMA map</p> </td> <td style="text-align: right;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> </table> | <p>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.</p> <p>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>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).</p> <p>- Topographic map, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA | <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applied to permanent pits</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA | <p>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.</p> <p>- NM Office of the State Engineer - iWATERS database search, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>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</p> <p>- Written confirmation or verification from the municipality. Written approval obtained from the municipality</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>Within 500 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>Within the area overlying a subsurface mine.</p> <p>- Written confirmation or verification or map from the NM EMNRD - Mining and Mineral Division</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>Within an unstable area.</p> <p>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society, Topographic map</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | <p>Within a 100-year floodplain</p> <p>- FEMA map</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.</p> <p>- NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>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).</p> <p>- Topographic map, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA | | | | | | | | | | | | | | | | | | | | |
| <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>(<i>Applied to permanent pits</i>)</p> <p>- Visual inspection (certification) of the proposed site, Aerial photo, Satellite image</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA | | | | | | | | | | | | | | | | | | | | |
| <p>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.</p> <p>- NM Office of the State Engineer - iWATERS database search, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>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</p> <p>- Written confirmation or verification from the municipality. Written approval obtained from the municipality</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>Within 500 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>Within the area overlying a subsurface mine.</p> <p>- Written confirmation or verification or map from the NM EMNRD - Mining and Mineral Division</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>Within an unstable area.</p> <p>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society, Topographic map</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | |
| <p>Within a 100-year floodplain</p> <p>- FEMA map</p> | <input type="checkbox"/> Yes <input type="checkbox"/> 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 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 _____ or Permit _____

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 NMAC
- ☐ 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

(PRE-SET)

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 French

☐ 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

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 / ILL Landfarm % ILL 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

☐ 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

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 - rWATER 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

- NM Office of the State Engineer - rWATER 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

- NM Office of the State Engineer - rWATER 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)

- Topographic map Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application

- Visual inspection (certification) of the proposed site Aerial photo satellite image

☐ Yes ☐ No

☐ 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 feet of any other fresh water well or spring, in existence at the time of the initial application

- NM Office of the State Engineer - rWATER 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

- 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

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) Jamie Goodwin Title Regulatory Technician
 Signature Jamie Goodwin Date 7/24/12
 e-mail address jamie.l.goodwin@conocophillips.com Telephone 505-326-9784

20

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

OCD Representative Signature: Orin D. Kelly **Approval Date:** 7/25/2012
Title: 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:** _____

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 (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 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) _____ Title _____
 Signature _____ Date _____
 e-mail address _____ Telephone _____

ConocoPhillips Mud Preset Drill

Closed Loop Design:

The closed loop design will not incorporate a temporary pit or below grade tank. The plan will utilize an above grade tank suitable for holding the cuttings and fluids generated during drilling operations. The volume of the tank shall be of a sufficient volume to maintain an adequate free board for periodic removal and disposal of cuttings and fluids.

ConocoPhillips may incorporate the use of a 20 mil, string reinforced, LLDPE liner with factory welded seams to line the drying pad in order to minimize the volume of fluids to be disposed of. The drying pad will be designed to prevent contamination of fresh water, protect public health and the environment, and have sumps to facilitate the collection of liquids derived from drilling cuttings, as specified per subsection H of 19 15 17 11. The cuttings pad will be constructed above grade and containment will be through the use of earthen berms of sufficient height to contain the cuttings and prevent run-off of surface water or fluids. The drying pad area will replace the area of the drill site previously designated for the reserve pit. It will be signed in compliance with 19 15.3.103.NMAC. Frac tanks will be utilized on site for fresh water storage.

Closed Loop Operations and Maintenance:

The closed loop system will be operated and maintained for solids and liquid containment to prevent ground water contamination as follows.

1. Any free liquids will be recovered and reused or disposed of at the Basin Disposal Facility (Permit # NM-01-005) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B). Reuse may include the relocating of liquids to be used in other permitted drilling operations.
2. Drill solids will be recovered from location and hauled to Envirotech (Permit #NM-01-0011) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) periodically as required to maintain a safe free board in the cuttings tank. No onsite trench burial of cuttings will occur.
3. In the event a drying pad is utilized, the cuttings will be picked up and transported to Basin Disposal Facility (Permit #NM-01-005) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B). The liner will be disposed of at the San Juan County Landfill located on CR 3100. The drying pad will be closed within 6 months from the date that the drilling rig is released. Berms constructed from native materials will be bladed on site to the location's contour.
4. Any drilling materials or trash will be stored and disposed of appropriately.
5. The NMOCD will be notified within 48 hours of the discovery of compromised integrity of the closed loop containment. Any required repairs will commence immediately.

Closed Loop Closure Plan:

1. Upon completion of the drilling operations, all solids and liquids will be removed and disposed of to Envirotech (Permit #NM-01-0011) and/or Basin Disposal Facility (Permit # NM-01-005) and/or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B). Equipment shall also be removed from location. In the event a drying pad is utilized, the solids contained on the pad shall remain on site to allow sufficient drying and will then be transported to Envirotech (Permit # NM-01-0011) or JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) within 6 months from the date that the drilling rig is released.

- 2 After the drying pad is removed the surface below will be visually inspected for any contamination. If contamination is discovered a five point composite sample will be taken of the drying pad area using sampling tools and all samples tested per Subsection B of 19.15.17.13(B)(1)(b). In the event that the criteria are not met, all contents will be handled per Subparagraph (a) of Paragraph (1) of Subsection B of 19.15.17.13 i.e., Dig and haul.

| Components | Tests Method | Limit (mg/Kg) |
|------------|---------------------------|---------------|
| Benzene | EPA SW-846 8021B or 8260B | 0.2 |
| BTEX | EPA SW-846 8021B or 8260B | 50 |
| TPH | EPA SW-846 418.1 | 2500 |
| GRO/DRO | EPA SW-846 8015M | 500 |
| Chlorides | EPA 300.1 | 500 |

- 3 Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be 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.
- 4 Notification will be sent to OCD when the reclaimed area is seeded.
- 5 COP shall seed the disturbed areas the first growing season after the operator closes the drying pad. 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.

| Type | Variety or Cultivator | PLS/A |
|--------------------------|-----------------------|-------|
| Western wheatgrass | Arriba | 3.0 |
| Indian ricegrass | Paloma or Rimrock | 3.0 |
| Slender wheatgrass | San Luis | 2.0 |
| Crested wheatgrass | Hy-crest | 3.0 |
| Bottlebrush Squirreltail | Unknown | 2.0 |
| Four-wing Saltbrush | Delar | 25 |

Species shall be planted in pounds of pure live seed per acre:

Present Pure Live Seed (PLS) = Purity X Germination/100

Two lots of seed can be compared on the basis of PLS as follows:

Source No. One (poor quality)

Purity 50 percent

Germination 40 percent

Percent PLS 20 percent

5 lb. bulk seed required to make

1 lb. PLS

Source No. two (better quality)

Purity 80 percent

Germination 63 percent

Percent PLS 50 percent

2 lb. bulk seed required to make

1 lb. PLS

ConocoPhillips
SAN JUAN BASIN
MODIFICATION PRE SET PERMIT
MUD DRILL

San Juan 28-7 Unit 131N
API# 30-039-30663

The San Juan 28-7 Unit 131N, API# 30-039-30663 has an approved C-144 (Air) Pre-Set Permit # 10243 dated 7/06/12. Due to change in plans, COP received verbal permission NMOCD (Brandon Powell) to mud drill.