

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

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

11863

- 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: BP AMERICA PRODUCTION COMPANY OGRID #: 778  
 Address: 200 ENERGY COURT, FARMINGTON, NM 87410  
 Facility or well name: Mudge A 58  
 API Number: 3004528005 OCD Permit Number: \_\_\_\_\_  
 U/L or Qtr/Qtr L Section 3 Township 31N Range 11W County: San Juan  
 Center of Proposed Design: Latitude 36-923961 Longitude -107.983723 NAD:  1927  1983  
 Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

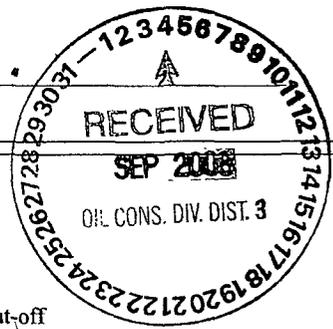
2.  **Pit:** Subsection F or G of 19.15.17.11 NMAC  
 Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
 Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

OIL CONS. DIV DIST. 3  
MAY 01 2014

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 (Closure Plan submittal only - Separator unit)  
 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 \_\_\_\_\_  
 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.

**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 \_\_\_\_\_

7.

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

- Screen  Netting  Other \_\_\_\_\_
- Monthly inspections (If netting or screening is not physically feasible)

8.

**Signs:** Subsection C of 19.15.17.11 NMAC

- 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- Signed in compliance with 19.15.3.103 NMAC

9.

**Administrative Approvals and Exceptions:**

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

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

- Administrative approval(s): Requests must be submitted to the appropriate division district 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.*

- |  |   |
|--|---|
| <p>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.<br/>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</p>   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br/>- Topographic map; Visual inspection (certification) of the proposed site</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. (<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>)<br/>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><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. (<i>Applies to permanent pits</i>)<br/>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><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.<br/>- 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.<br/>- 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.<br/>- 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.<br/>- 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.<br/>- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</p>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within a 100-year floodplain.<br/>- FEMA map</p>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |



16.

**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 indentify 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): LARRY SCHLOTTERBACK

Title: ENVIRONMENTAL COORDINATOR

Signature: [Handwritten Signature]

Date: AUGUST 22, 2008

e-mail address: larry.schlotterback@bp.com

Telephone: (505) 326-9200

20.

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

OCD Representative Signature: [Handwritten Signature]

[Handwritten Signature]  
Compliance Officer

Approval Date: 10-7-08

Title: Enviro Spec

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: 5-19-2011

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 36.923961 Longitude -107.983723 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): Jeff Peace

Title: Area Environmental Advisor

Signature: [Handwritten Signature]

Date: May 1, 2014

e-mail address: peace.jeffrey@bp.com

Telephone: (505) 326-9479

BP AMERICA PRODUCTION COMPANY  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Mudge A 58 Tank B (21 bbl)

API No. 3004528005

Unit Letter L, Section 3, T31N, R11W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT 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 retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.  
**Notice is attached.**
2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.  
**No notice was made due to misunderstanding of the notice requirements. Closure notices will be made for all BGT closures from this point forward.**
3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
  - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)

- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

**All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.**

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

**The BGT was transported to a storage area for sale and re-use.**

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

**All equipment associated with the BGT has been removed.**

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method <b>21 bbl BGT – Tank B</b>	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

**Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.**

**Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.**

7. BP shall notify the division District III office of its results on form C-141.

**C-141 is attached.**

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

**Sampling results indicate no release occurred.**

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not within the active process area

**The area under the BGT was backfilled with clean soil and is still within the active area.**

10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

**The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

**BP will seed the area when the well is plugged and abandoned.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.

**BP will notify NMOCD when re-vegetation is successful.**

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.

**Closure report on C-144 form is included.**

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

**Certification section of C-144 has been completed.**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., 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

Form C-141  
Revised August 8, 2011

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

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: Mudge A 58	Facility Type: Natural gas well
Surface Owner: Federal	Mineral Owner: Federal
API No. 3004528005	

**LOCATION OF RELEASE**

Unit Letter L	Section 3	Township 31N	Range 11W	Feet from the 1,600	North/South Line South	Feet from the 790	East/West Line West	County: San Juan
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Latitude 36.923961 Longitude 107.983723

**NATURE OF RELEASE**

Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tank – 21 bbl, Tank B	Date and Hour of Occurrence:	Date and Hour of Discovery:
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.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chloride below standards. Analysis results are attached.		
Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. The excavated area was backfilled and compacted is still within the active well area.		

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.

Signature: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Jeff Peace	Approved by Environmental Specialist:	
Title: Area Environmental Advisor	Approval Date:	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: May 1, 2014	Phone: 505-326-9479	

\* Attach Additional Sheets If Necessary

CLIENT: <b>BP</b>	<b>BLAGG ENGINEERING, INC.</b> P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: <b>3004528005</b>
		TANK ID (if applicable): <b>B</b>

# FIELD REPORT:

(circle one):  BGT CONFIRMATION /  RELEASE INVESTIGATION /  OTHER:

PAGE #: **1** of **1**

SITE INFORMATION:		SITE NAME: <b>MUDGE A # 58</b>	
QUAD/UNIT: <b>L</b>	SEC: <b>3</b>	TWP: <b>31N</b>	RNG: <b>11W</b> PM: <b>NM</b> CNTY: <b>SJ</b> ST: <b>NM</b>
1/4 -1/4/FOOTAGE: <b>1,600'S / 790'W</b>		<b>NW/SW</b> LEASE TYPE: <input checked="" type="checkbox"/> FEDERAL / <input type="checkbox"/> STATE / <input type="checkbox"/> FEE / <input type="checkbox"/> INDIAN	
LEASE #: <b>SF078040</b>	PROD. FORMATION: <b>FT</b>	CONTRACTOR: <b>ELKHORN MBF - D. HARRIS</b>	

DATE STARTED: **05/06/11**

DATE FINISHED:

ENVIRONMENTAL SPECIALIST(S): **NJV**

REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.:	<b>36.92410 X 107.98412</b>	GL ELEV.:	<b>6,044'</b>
1) <del>95 BBL BGT (GWDB)</del>	GPS COORD.:	<del>36.923903 X 107.984177</del>	DISTANCE/BEARING FROM W.H.:	<del>77' S49W</del>
2) <b>ABAN. 21 BBL BGT</b>	GPS COORD.:	<b>36.923961 X 107.983723</b>	DISTANCE/BEARING FROM W.H.:	<b>120', S65E</b>
3) _____	GPS COORD.:	_____	DISTANCE/BEARING FROM W.H.:	_____
4) _____	GPS COORD.:	_____	DISTANCE/BEARING FROM W.H.:	_____

LAB INFORMATION:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED:	<b>HALL</b>	OVM READING (ppm)
1) <del>SAMPLE ID: 5-DC TB @ 5' (95 BGT)</del>	SAMPLE DATE:	<del>05/06/11</del>	<del>1220</del>
2) <b>TH1 @ 7' (ABAN. 21 BGT)</b>	SAMPLE DATE:	<b>05/06/11</b>	<b>1220</b>
3) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____
4) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____

SOIL DESCRIPTION:	SOIL TYPE: <input checked="" type="checkbox"/> SAND / <input type="checkbox"/> SILTY SAND / <input type="checkbox"/> SILT / <input type="checkbox"/> SILTY CLAY / <input type="checkbox"/> CLAY / <input type="checkbox"/> GRAVEL / OTHER
SOIL COLOR: <b>DARK YELLOWISH ORANGE TO BROWN</b>	
COHESION (ALL OTHERS): <input checked="" type="checkbox"/> NON COHESIVE / <input type="checkbox"/> SLIGHTLY COHESIVE / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> HIGHLY COHESIVE	PLASTICITY (CLAYS): <input type="checkbox"/> NON PLASTIC / <input type="checkbox"/> SLIGHTLY PLASTIC / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> MEDIUM PLASTIC / <input type="checkbox"/> HIGHLY PLASTIC
CONSISTENCY (NON COHESIVE SOILS): <input checked="" type="checkbox"/> LOOSE / <input type="checkbox"/> FIRM / <input type="checkbox"/> DENSE / <input type="checkbox"/> VERY DENSE	DENSITY (COHESIVE CLAYS & SILTS): <input type="checkbox"/> SOFT / <input type="checkbox"/> FIRM / <input type="checkbox"/> STIFF / <input type="checkbox"/> VERY STIFF / <input type="checkbox"/> HARD
MOISTURE: <input checked="" type="checkbox"/> DRY / <input type="checkbox"/> SLIGHTLY MOIST / <input type="checkbox"/> MOIST / <input type="checkbox"/> WET / <input type="checkbox"/> SATURATED / <input type="checkbox"/> SUPER SATURATED	HC ODOR DETECTED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____
SAMPLE TYPE: <input checked="" type="checkbox"/> GRAB / <input type="checkbox"/> COMPOSITE - # OF PTS. <b>5</b>	
DISCOLORATION/STAINING OBSERVED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	

ANY AREAS DISPLAYING WETNESS: YES  NO  EXPLANATION - \_\_\_\_\_

ADDITIONAL COMMENTS: \_\_\_\_\_

EXCAVATION DIMENSIONS (if applicable): **NA** ft. X **NA** ft. X **NA** ft. cubic yards excavated (if applicable): **NA**

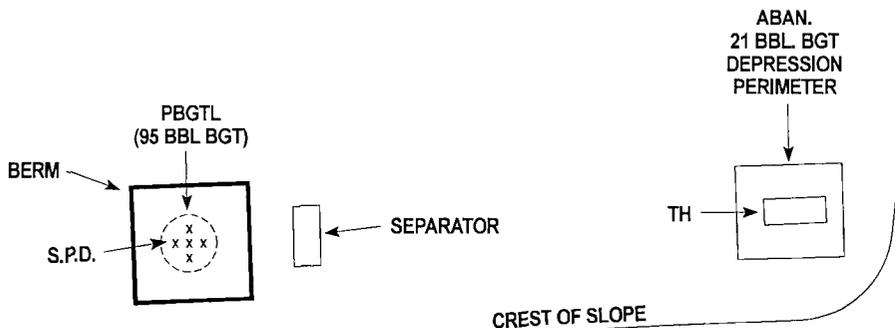
DEPTH TO GROUNDWATER: **<100'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **<1,000'** NMOCD TPH CLOSURE STD: **100** PPM

## SITE SKETCH

⊕  
WELL HEAD

PLOT PLAN circle: attached

OVM CALIB. READ. = <b>NA</b> ppm	RF = 0.52
OVM CALIB. GAS = <b>NA</b> ppm	
TIME: <b>NA</b> am/pm	DATE: <b>NA</b>



## MISCELL. NOTES

**WO: N1350291**  
**WO: 43783**  
**PAYKEY: ZSCHWLLSEL**

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

BGT SIDEWALLS VISIBLE: Y  N  NA

Magnetic declination: **10** ° E

TRAVEL NOTES: CALLOUT: **05/04/11 - late after.** ONSITE: **05/06/11**

**Hall Environmental Analysis Laboratory, Inc.**

Date: 19-May-11

**CLIENT:** Blagg Engineering  
**Lab Order:** 1105456  
**Project:** Mudge A #58  
**Lab ID:** 1105456-02

**Client Sample ID:** TH1 @7' ABAN.ZI BGT  
**Collection Date:** 5/6/2011 12:25:00 PM  
**Date Received:** 5/11/2011  
**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: <b>JB</b>
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	5/17/2011 1:21:18 PM
Surr: DNOP	109	81.8-129		%REC	1	5/17/2011 1:21:18 PM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/16/2011 12:41:58 PM
Surr: BFB	105	89.7-125		%REC	1	5/16/2011 12:41:58 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: <b>NSB</b>
Benzene	ND	0.050		mg/Kg	1	5/16/2011 12:41:58 PM
Toluene	ND	0.050		mg/Kg	1	5/16/2011 12:41:58 PM
Ethylbenzene	ND	0.050		mg/Kg	1	5/16/2011 12:41:58 PM
Xylenes, Total	ND	0.099		mg/Kg	1	5/16/2011 12:41:58 PM
Surr: 4-Bromofluorobenzene	108	85.3-139		%REC	1	5/16/2011 12:41:58 PM
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: <b>SRM</b>
Chloride	ND	1.5		mg/Kg	1	5/17/2011 9:01:47 PM
<b>EPA METHOD 418.1: TPH</b>						Analyst: <b>JB</b>
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	5/17/2011

**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: Blagg Engineering  
 Project: Mudge A #58

Work Order: 1105456

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
<b>Method: EPA Method 300.0: Anions</b>											
Sample ID: MB-26851		MBLK									
Chloride	ND	mg/Kg	1.5								
Sample ID: LCS-26851		LCS									
Chloride	14.34	mg/Kg	1.5	15	0	95.6	90	110			

<b>Method: EPA Method 418.1: TPH</b>											
Sample ID: MB-26826		MBLK									
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-26826		LCS									
Petroleum Hydrocarbons, TR	99.06	mg/Kg	20	100	0	99.1	81.4	118			
Sample ID: LCSD-26826		LCSD									
Petroleum Hydrocarbons, TR	104.4	mg/Kg	20	100	0	104	81.4	118	5.23	8.58	

<b>Method: EPA Method 8015B: Diesel Range Organics</b>											
Sample ID: 1105456-01AMSD		MSD									
Diesel Range Organics (DRO)	52.88	mg/Kg	10	50	0	106	57.5	128	7.09	19.7	
Sample ID: MB-26825		MBLK									
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-26825		LCS									
Diesel Range Organics (DRO)	50.18	mg/Kg	10	50	0	100	66.2	120			
Sample ID: LCSD-26825		LCSD									
Diesel Range Organics (DRO)	48.65	mg/Kg	10	50	0	97.3	66.2	120	3.10	14.3	
Sample ID: 1105456-01AMS		MS									
Diesel Range Organics (DRO)	49.26	mg/Kg	10	50	0	98.5	57.5	128			

<b>Method: EPA Method 8016B: Gasoline Range</b>											
Sample ID: 1105456-01AMSD		MSD									
Gasoline Range Organics (GRO)	27.71	mg/Kg	5.0	25	0	111	57.7	165	0.898	15.5	
Sample ID: MB-26811		MBLK									
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-26811		LCS									
Gasoline Range Organics (GRO)	28.87	mg/Kg	5.0	25	0	115	88.8	124			
Sample ID: 1105456-01AMS		MS									
Gasoline Range Organics (GRO)	27.96	mg/Kg	5.0	25	0	112	57.7	165			

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

## QA/QC SUMMARY REPORT

Client: Blagg Engineering

Project: Mudge A #58

Work Order: 1105456

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
<b>Method: EPA Method 8021B: Volatiles</b>											
<b>Sample ID: 1105456-02AMSD</b>		<b>MSD</b>			<b>Batch ID: 26811</b>		<b>Analysis Date: 5/16/2011 3:06:38 PM</b>				
Benzene	0.8702	mg/Kg	0.050	1	0.0144	85.6	67.2	113	4.14	14.3	
Toluene	0.9401	mg/Kg	0.050	1	0.0121	92.8	62.1	116	0.999	15.9	
Ethylbenzene	0.9731	mg/Kg	0.050	1	0	97.3	67.9	127	1.46	14.4	
Xylenes, Total	2.964	mg/Kg	0.10	3	0	98.8	60.6	134	2.29	12.6	
<b>Sample ID: MB-26811</b>		<b>MBLK</b>			<b>Batch ID: 26811</b>		<b>Analysis Date: 5/16/2011 4:04:22 PM</b>				
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								
<b>Sample ID: LCS-26811</b>		<b>LCS</b>			<b>Batch ID: 26811</b>		<b>Analysis Date: 5/16/2011 3:35:31 PM</b>				
Benzene	0.9022	mg/Kg	0.050	1	0.0145	88.8	83.3	107			
Toluene	0.9496	mg/Kg	0.050	1	0.0132	93.6	74.3	115			
Ethylbenzene	0.9661	mg/Kg	0.050	1	0.0138	95.2	80.9	122			
Xylenes, Total	2.912	mg/Kg	0.10	3	0.0257	96.2	85.2	123			
<b>Sample ID: 1105456-02AMS</b>		<b>MS</b>			<b>Batch ID: 26811</b>		<b>Analysis Date: 5/16/2011 2:37:43 PM</b>				
Benzene	0.8349	mg/Kg	0.050	1	0.0144	82.0	67.2	113			
Toluene	0.9307	mg/Kg	0.050	1	0.0121	91.9	62.1	116			
Ethylbenzene	0.9590	mg/Kg	0.050	1	0	95.9	67.9	127			
Xylenes, Total	2.897	mg/Kg	0.10	3	0	96.6	60.6	134			

## Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

# Hall Environmental Analysis Laboratory, Inc.

## Sample Receipt Checklist

Client Name **BLAGG**

Date Received:

5/11/2011

Work Order Number 1105456

Received by: **MMG**

Checklist completed by:

Michael Gou 5/11/11  
Signature Date

Sample ID labels checked by:

Initials MMG [Signature]

Matrix:

Carrier name: Greyhound

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>	
Custody seals intact on shipping container/cooler?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>	Not Shipped <input type="checkbox"/>
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Water - VOA vials have zero headspace?	No VOA vials submitted <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Number of preserved bottles checked for pH:
Water - Preservation labels on bottle and cap match?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
Water - pH acceptable upon receipt?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	<2 >12 unless noted below.
Container/Temp Blank temperature?	<b>2.5°</b>	<6° C Acceptable		
COMMENTS:	If given sufficient time to cool.			

Client contacted \_\_\_\_\_ Date contacted: \_\_\_\_\_ Person contacted \_\_\_\_\_

Contacted by: \_\_\_\_\_ Regarding: \_\_\_\_\_

Comments: \_\_\_\_\_

Corrective Action \_\_\_\_\_

bp



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

**CERTIFIED MAIL RECEIPT**  
**RETURN RECEIPT**

**7007 1490 005 0858 7674**

September 2, 2008

Bureau of Land Management  
1235 La Plata Highway  
Farmington, NM 87401

RE: Notice of Proposed Below Grade Tank Closure  
Mudge A 58  
Unit Letter L, Section 3, Township 31N, Range 11W

Dear Mr. Mark Kelly:

In regards to the captioned subject and requirements of the new NMOCD pit rule, this letter is notification that BP America Production Company is planning to close a 21 barrel Below Grade Tank (BGT) that will no longer be used in on this location.

Should you have any questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Schlotterback".

Larry Schlotterback  
Field Environmental Coordinator

