

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., 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  
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.  
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or

12889 Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
45-06609 ☒ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, 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: Burlington Resources OGRID #: 14538  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: Bunny Et Al #1  
API Number: 30-045-06609 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr P Section 10 Township 27N Range 9W County: San Juan  
Center of Proposed Design: Latitude 36.58562 °N Longitude -107.77059  
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotmen

OIL CONS. DIV DIST. 3

APR 23 2015

**DENIED**

\*NO 418.1 please  
Resubmit with  
Correct Lab Sample  
As Indicated  
By 19.15.17.13

BY: Cory Smith  
DATE: 9/15/15 (505) 334-6178 Ext. 115

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ 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 \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Metal  
☐ 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 45 mil ☐ HDPE ☐ PVC ☒ Other LLDPE

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**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 \_\_\_\_\_

6.

**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)

7.

**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 19.15.16.8 NMAC

8.

**Variances 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:**

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

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

9.

**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. Siting criteria does not apply to drying pads or above-grade tanks.

### General siting

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No  
☒ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☒ NA

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. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. **(Does not apply to below grade tanks)**

- 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. **(Does not apply to below grade tanks)**

- FEMA map

☐ Yes ☐ No

### Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

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

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

### Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

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

☐ Yes ☐ No

Within 300 feet from a occupied 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

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet 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 search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any 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

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

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 1000 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

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ 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

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

11.

#### **Multi-Well Fluid Management Pit 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.

- ☐ 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
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ 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
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**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 ☐ Multi-well Fluid Management Pit  
☐ Alternative
- Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14.

**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 C 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 H of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**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 require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 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 25-50 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 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 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, 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
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 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 incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> No

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 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

16.

**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 E of 19.15.17.13 NMAC  
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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 19.15.17.13 NMAC  
☐ Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC  
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**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): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Appl

**DENIED**

nly) ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** \_\_\_\_\_

**Approval Date:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**D Permit Number:** \_\_\_\_\_

19.

**Closure Report (required within 60 days of closure completion):** 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:** 9/17/2013

20.

**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.

21.

**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 for private land only)  
☐ 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 \_\_\_\_\_°N \_\_\_\_\_°W \_\_\_\_\_ Longitude \_\_\_\_\_°W \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

**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): Patsy Clugston Title: Staff Regulatory Technician

Signature:  Date: 4/22/15

e-mail address: Patsy.L.Clugston@conocophillips.com Telephone: (505) 326-9518

**Burlington Resources Oil Gas Company, LP**  
**San Juan Basin**  
**Below Grade Tank Closure Report**  
**(Without Reclamation)**

**Lease Name: BUNNY ET AL 1**

**API No.: 30-045-06609**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do 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, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.
2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**
3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

**All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.**

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

**The below-grade tank was disposed of in a division-approved manner.**

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

**All on-site equipment associated with the below-grade tank was removed.**

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

4/23/2015



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

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	100
Chlorides	EPA 300.1	250

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

**A release was not determined for the above referenced well.**

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

**The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.**

10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
- Operator's name
  - Location by Unit Letter, Section, Township, and Range. Well name and API number.

**Notification is missing due to employee turnovers. ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.**

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

**The closure process notification to the landowner not found. COPC was not aware that the original notification sent at the time of Permitting was not the only closure notification required.**

**ConocoPhillips has reviewed our internal processes and has updated them to include the required 72 hour notification.**

12. 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 place 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.

**This well's pad was damaged by water erosion from the wash. The well pad will be repaired so that the equipment can be reinstalled and the well can be put back into production. The wash bank will be armored with revetment mats to protect the well pad.**

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures

(administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

**Provision 13 will be accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.**

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

**The below-grade tank area will be backfilled and more than four feet of cover will be achieved and the cover will included one foot of suitable material to establish vegetation at the site.**

15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
  - Soil Backfilling and Cover Installation **(See Report)**
  - Re-vegetation application rates and seeding techniques **(See Report)**
  - Photo documentation of the site reclamation **(Included as an attachment)**
  - Confirmation Sampling Results **(Included as an attachment)**
  - Proof of closure notice **(Included as an attachment)**

**Closure Documentation was not submitted within the 60 day requirement due to regulatory not being notified in a timely manner. Issues over approval jurisdiction between the Navajo Tribe and the BLM have caused delays.**



Animas Environmental Services, LLC

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

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3084

December 11, 2013

Lindsay Dumas  
ConocoPhillips  
San Juan Business Unit  
Office 214-07  
5525 Hwy 64  
Farmington, New Mexico 87401

Via electronic mail to: [SJBUE-Team@ConocoPhillips.com](mailto:SJBUE-Team@ConocoPhillips.com)

**RE: Below Grade Tank Closure Report  
Bunny Et Al #1  
San Juan County, New Mexico**

Dear Ms. Dumas:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Bunny Et Al #1, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

---

## 1.0 Site Information

### 1.1 Location

Site Name – Bunny Et Al #1

Legal Description – SE¼ SE¼, Section 10, T27N, R9W, San Juan County, New Mexico

Well Head Latitude/Longitude – N36.58542 and W107.77088, respectively

BGT Latitude/Longitude – N36.58563 and W107.77059, respectively

Land Jurisdiction – Navajo Nation Allotment

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, September 2013

### 1.2 NMOCD Ranking

The Bunny Et Al #1 is located within the Navajo Nation Allotment. Navajo Nation Environmental Protection Agency (NNEPA) adheres to action levels for releases and spills as established by the New Mexico Oil Conservation Division (NMOCD).

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 40 based on the following factors:

- **Depth to Groundwater:** A Pit Remediation and Closure Report form dated June 2004 reported the depth to groundwater as less than 50 feet below ground surface (bgs). (20 points)
- **Wellhead Protection Area:** The tank location is not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** Hoot Owl Wash is adjacent to the location. The wash in Jaquez Canyon is located approximately and 660 feet south-southeast of the location. (20 points)

### 1.3 BGT Closure Assessment

AES was initially contacted by Lisa Hunter, CoP representative, on September 17, 2013, and on the same day, Corwin Lameman of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

---

## 2.0 Soil Sampling

On September 17, 2013, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs). Soil sample SC-1 was field screened for VOCs and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

### 2.1 Field Screening

#### 2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

## 2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B;
- TPH for gasoline range organics (GRO) and diesel range organics (DRO) per USEPA Method 8015D; and
- Chloride per USEPA Method 300.0.

## 2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 1.7 ppm in S-1 up to 3.2 ppm in SC-4. Field screening results are summarized in Table 1 and presented on Figure 2.

Table 1. Soil Field Screening VOC Results  
Bunny Et Al #1 BGT Closure, September 2013

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>
S-1	9/17/13	0.5	1.7
S-2	9/17/13	0.5	1.8
S-3	9/17/13	0.5	2.0
S-4	9/17/13	0.5	3.2
S-5	9/17/13	0.5	2.7
SC-1	9/17/13	0.5	2.4

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.048 mg/kg and 0.24 mg/kg, respectively. TPH concentrations as GRO and DRO were reported at less than 4.8 mg/kg and 10.0 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 1.5 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Table 2. Soil Laboratory Analytical Results  
Bunny Et Al #1 BGT Closure, September 2013

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action Level (NMAC 19.15.17.13E)			0.2	50	100		250
SC-1	9/17/13	0.5	<0.048	<0.24	<4.8	<10	<1.5

### 3.0 Conclusions and Recommendations

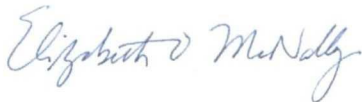
The Bunny Et Al #1, located within the Navajo Nation Allotment. In accordance NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Laboratory analytical results for TPH (as GRO/DRO) in SC-1 were reported below the NMOCD action level of 100 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. The chloride concentration in SC-1 was below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work associated with the BGT closure is recommended at Bunny Et Al #1.

If you have any questions about this report or site conditions, please do not hesitate to contact me at (505) 564-2281.

Sincerely,



Deborah Watson, P.G.  
Sr. Project Manager

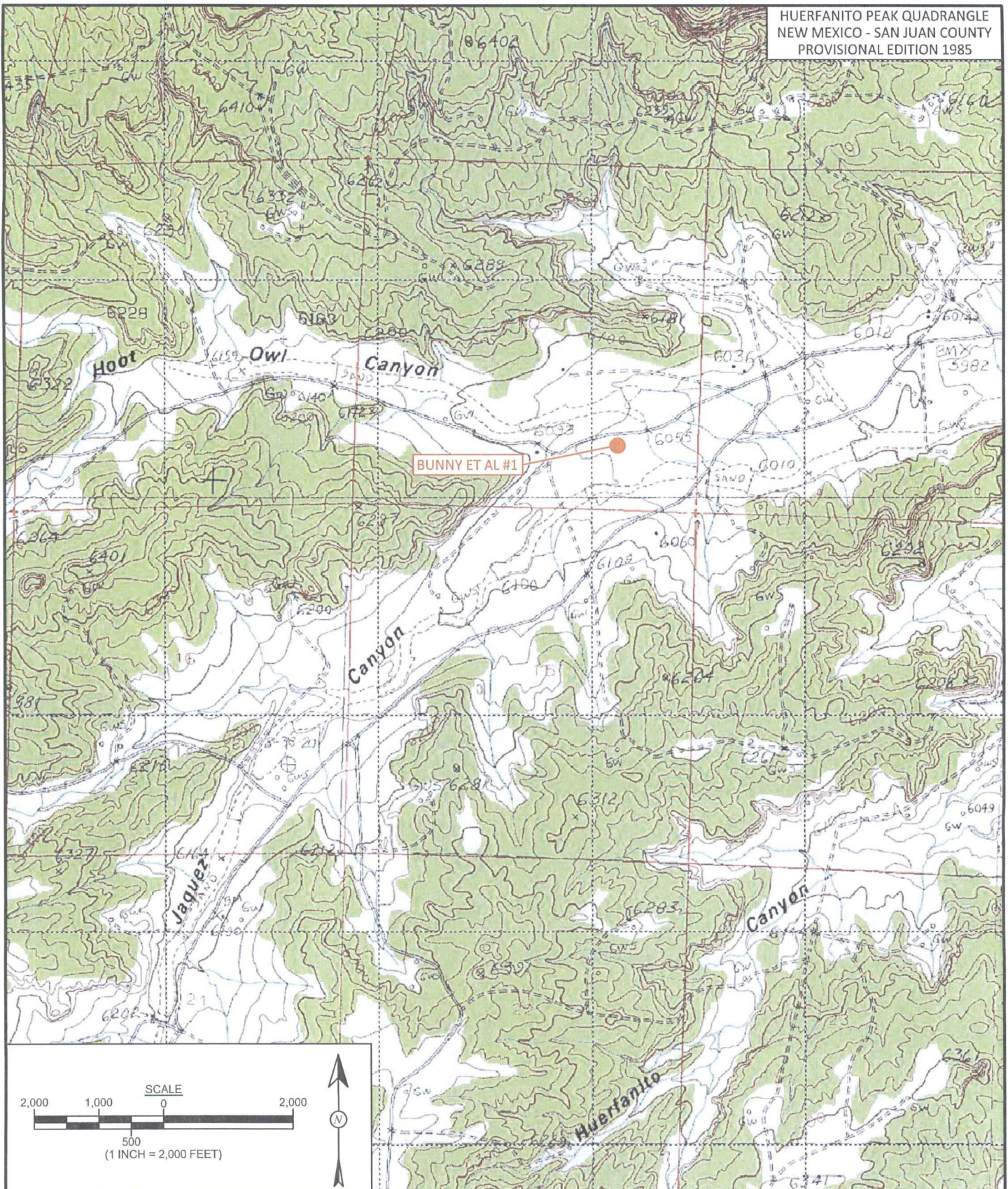


Elizabeth McNally, P.E.

#### Attachments:

- Figure 1. Topographic Site Location Map
- Figure 2. Aerial Site Map, September 2013
- Hall Analytical Report 1309739

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\Bunny ET AL #1 Assessment\Bunny Et Al #1 BGT Closure Report 121113.docx



**FIGURE 1**

**TOPOGRAPHIC SITE LOCATION MAP**

ConocoPhillips  
BUNNY ET AL #1  
SE¼ SE¼, SECTION 10, T27N, R9W  
SAN JUAN COUNTY, NEW MEXICO  
N36.58542, W107.77088

**DRAWN BY:**

C. Lameman

**DATE DRAWN:**

December 4, 2013

**REVISIONS BY:**

C. Lameman

**DATE REVISED:**

December 4, 2013

**CHECKED BY:**

D. Watson

**DATE CHECKED:**

December 4, 2013

**APPROVED BY:**

E. McNally

**DATE APPROVED:**

December 4, 2013

# LEGEND

● SAMPLE LOCATIONS

## Field Screening Results

Sample ID	Date	OVM-PID (ppm)
NMOCD ACTION LEVEL		--
S-1	9/17/13	1.7
S-2	9/17/13	1.8
S-3	9/17/13	2.0
S-4	9/17/13	3.2
S-5	9/17/13	2.7
SC-1	9/17/13	2.4

SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5.  
NA - NOT ANALYZED

## Laboratory Analytical Results

Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL		0.2	50	100		250
SC-1	9/17/13	<0.048	<0.24	<4.8	<10	<1.5

SAMPLE WAS ANALYZED PER EPA METHOD 8021B, 8015D, AND 300.0.



AERIAL SOURCE: © 2012 GOOGLE EARTH, AERIAL DATE: MAY 2, 2013.

## FIGURE 2

AERIAL SITE MAP  
BELOW GRADE TANK CLOSURE  
SEPTEMBER 2013

ConocoPhillips  
BUNNY ET AL #1

SE¼ SE¼, SECTION 10, T27N, R9W  
SAN JUAN COUNTY, NEW MEXICO  
N36.58542, W107.77088

### DRAWN BY:

C. Lameman

### DATE DRAWN:

December 4, 2013

### REVISIONS BY:

C. Lameman

### DATE REVISED:

December 4, 2013

### CHECKED BY:

D. Watson

### DATE CHECKED:

December 11, 2013

### APPROVED BY:

E. McNally

### DATE APPROVED:

December 11, 2013

AES



Animas Environmental Services, LLC



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)

September 25, 2013

Debbie Watson  
Animas Environmental  
624 East Comanche  
Farmington, NM 87401  
TEL: (505) 486-4071  
FAX

RE: COP Bunny ET AL #1

OrderNo.: 1309739

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 9/18/2013 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in dark ink, appearing to read "Andy Freeman", is written over a light blue horizontal line.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1309739

Date Reported: 9/25/2013

CLIENT: Animas Environmental

Client Sample ID: ~~SC-2~~ SC-1 DAW

Project: COP Bunny ET AL #1

Collection Date: 9/17/2013 10:52:00 AM

Lab ID: 1309739-001

Matrix: SOIL

Received Date: 9/18/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 8015D: DIESEL RANGE ORGANICS</b>							Analyst: <b>BCN</b>
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	9/24/2013 5:00:04 PM	9414
Surr: DNOP	91.0	63-147		%REC	1	9/24/2013 5:00:04 PM	9414
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	9/23/2013 12:27:08 PM	9416
Surr: BFB	91.4	80-120		%REC	1	9/23/2013 12:27:08 PM	9416
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.048		mg/Kg	1	9/23/2013 12:27:08 PM	9416
Toluene	ND	0.048		mg/Kg	1	9/23/2013 12:27:08 PM	9416
Ethylbenzene	ND	0.048		mg/Kg	1	9/23/2013 12:27:08 PM	9416
Xylenes, Total	ND	0.096		mg/Kg	1	9/23/2013 12:27:08 PM	9416
Surr: 4-Bromofluorobenzene	98.2	80-120		%REC	1	9/23/2013 12:27:08 PM	9416
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>JRR</b>
Chloride	ND	1.5		mg/Kg	1	9/23/2013 6:17:10 PM	9428

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1309739

25-Sep-13

Client: Animas Environmental

Project: COP Bunny ET AL #1

Sample ID	MB-9428	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386298	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-9428	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386299	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.2	90	110			

Sample ID	1309742-001BMS	SampType:	MS	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386340	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.2	58.8	109			

Sample ID	1309742-001BMSD	SampType:	MSD	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386341	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	91.7	58.8	109	0.487	20	

Sample ID	1309739-001BMS	SampType:	MS	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-2	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386347	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0.4749	88.2	58.8	109			

Sample ID	1309739-001BMSD	SampType:	MSD	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-2	Batch ID:	9428	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386348	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0.4749	87.9	58.8	109	0.316	20	

### Qualifiers:

- |   |  |
|---|--|
| * Value exceeds Maximum Contaminant Level.        | B Analyte detected in the associated Method Blank    |
| E Value above quantitation range                  | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits      | ND Not Detected at the Reporting Limit               |
| O RSD is greater than RSDlimit                    | P Sample pH greater than 2 for VOA and TOC only.     |
| R RPD outside accepted recovery limits            | RL Reporting Detection Limit                         |
| S Spike Recovery outside accepted recovery limits |  |

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1309739

25-Sep-13

Client: Animas Environmental

Project: COP Bunny ET AL #1

Sample ID	MB-9414		SampType: MBLK		TestCode: EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS		Batch ID: 9414		RunNo: 13509					
Prep Date:	9/20/2013		Analysis Date: 9/20/2013		SeqNo: 384395		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	7.0		10.00		69.6	63	147			

Sample ID	LCS-9414		SampType: LCS		TestCode: EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 9414		RunNo: 13510					
Prep Date:	9/20/2013		Analysis Date: 9/20/2013		SeqNo: 384988		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	58	10	50.00	0	116	77.1	128			
Surr: DNOP	5.3		5.000		105	63	147			

Sample ID	1309739-001AMS		SampType: MS		TestCode: EPA Method 8015D: Diesel Range Organics					
Client ID:	SC-2		Batch ID: 9414		RunNo: 13566					
Prep Date:	9/20/2013		Analysis Date: 9/24/2013		SeqNo: 386709		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	40	10	49.85	0	79.3	61.3	138			
Surr: DNOP	4.9		4.985		98.7	63	147			

Sample ID	1309739-001AMSD		SampType:	MSD		TestCode:	EPA Method 8015D: Diesel Range Organics				
Client ID:	SC-2		Batch ID:	9414		RunNo:	13566				
Prep Date:	9/20/2013		Analysis Date:	9/24/2013		SeqNo:	386710		Units: mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Diesel Range Organics (DRO)	36	10	49.85	0	72.0	61.3	138	9.62	20		
Surr: DNOP	4.8		4.985		95.5	63	147	0	0		

### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1309739

25-Sep-13

Client: Animas Environmental

Project: COP Bunny ET AL #1

Sample ID	MB-9416	SampType:	MBLK		TestCode:	EPA Method 8015D: Gasoline Range				
Client ID:	PBS	Batch ID:	9416		RunNo:	13551				
Prep Date:	9/20/2013	Analysis Date:	9/23/2013		SeqNo:	385515		Units:	mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	940		1000		93.5	80	120			

Sample ID	LCS-9416		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 9416		RunNo: 13551					
Prep Date:	9/20/2013		Analysis Date: 9/23/2013		SeqNo: 385517		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	90.9	74.5	126			
Surr: BFB	1000		1000		104	80	120			

Sample ID	1309742-001AMS		SampType: MS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	BatchQC		Batch ID: 9416		RunNo: 13551					
Prep Date:	9/20/2013		Analysis Date: 9/23/2013		SeqNo: 385528		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	21	4.7	23.47	0	87.8	76	156			
Surr: BFB	930		939.0		98.7	80	120			

Sample ID	1309742-001AMSD		SampType: MSD		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	BatchQC		Batch ID: 9416		RunNo: 13551					
Prep Date:	9/20/2013		Analysis Date: 9/23/2013		SeqNo: 385531		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	21	4.7	23.50	0	87.6	76	156	0.134	17.7	
Surr: BFB	920		939.8		98.2	80	120	0	0	

### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1309739

25-Sep-13

Client: Animas Environmental

Project: COP Bunny ET AL #1

Sample ID	<b>MB-9416</b>		SampType:	<b>MBLK</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>PBS</b>		Batch ID:	<b>9416</b>		RunNo:	<b>13551</b>			
Prep Date:	<b>9/20/2013</b>		Analysis Date:	<b>9/23/2013</b>		SeqNo:	<b>385554</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120			

Sample ID	<b>LCS-9416</b>		SampType:	<b>LCS</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>LCSS</b>		Batch ID:	<b>9416</b>		RunNo:	<b>13551</b>			
Prep Date:	<b>9/20/2013</b>		Analysis Date:	<b>9/23/2013</b>		SeqNo:	<b>385555</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.050	1.000	0	95.6	80	120			
Toluene	0.96	0.050	1.000	0	95.8	80	120			
Ethylbenzene	0.96	0.050	1.000	0	95.7	80	120			
Xylenes, Total	2.9	0.10	3.000	0	96.3	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			

Sample ID	<b>1309739-001AMS</b>		SampType:	<b>MS</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>SC-2</b>		Batch ID:	<b>9416</b>		RunNo:	<b>13551</b>			
Prep Date:	<b>9/20/2013</b>		Analysis Date:	<b>9/23/2013</b>		SeqNo:	<b>385557</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.79	0.047	0.9381	0	84.1	67.3	145			
Toluene	0.80	0.047	0.9381	0.003965	84.9	66.8	144			
Ethylbenzene	0.81	0.047	0.9381	0	86.9	61.9	153			
Xylenes, Total	2.5	0.094	2.814	0	87.4	65.8	149			
Surr: 4-Bromofluorobenzene	0.99		0.9381		105	80	120			

Sample ID	<b>1309739-001AMSD</b>		SampType:	<b>MSD</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>SC-2</b>		Batch ID:	<b>9416</b>		RunNo:	<b>13551</b>			
Prep Date:	<b>9/20/2013</b>		Analysis Date:	<b>9/23/2013</b>		SeqNo:	<b>385561</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.83	0.047	0.9398	0	88.7	67.3	145	5.53	20	
Toluene	0.84	0.047	0.9398	0.003965	88.6	66.8	144	4.41	20	
Ethylbenzene	0.85	0.047	0.9398	0	90.3	61.9	153	4.02	20	
Xylenes, Total	2.5	0.094	2.820	0	90.4	65.8	149	3.52	20	
Surr: 4-Bromofluorobenzene	0.99		0.9398		105	80	120	0	0	

### Qualifiers:

- |   |  |
|---|--|
| * Value exceeds Maximum Contaminant Level.        | B Analyte detected in the associated Method Blank    |
| E Value above quantitation range                  | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits      | ND Not Detected at the Reporting Limit               |
| O RSD is greater than RSDlimit                    | P Sample pH greater than 2 for VOA and TOC only.     |
| R RPD outside accepted recovery limits            | RL Reporting Detection Limit                         |
| S Spike Recovery outside accepted recovery limits |  |



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: www.hallenvironmental.com

## Sample Log-In Check List

Client Name: Animas Environmental

Work Order Number: 1309739

RcptNo: 1

Received by/date:

LMC9/18/13

Logged By: Anne Thorne

9/18/2013 10:00:00 AM

*Anne Thorne*

Completed By: Anne Thorne

9/18/2013

*Anne Thorne*

Reviewed By:

*df 9/20*

### Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

### Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of  $>0^{\circ}\text{C}$  to  $6.0^{\circ}\text{C}$ ? Yes ☒ No ☐ NA ☐
6. Sample(s) in proper container(s)? Yes ☒ No ☐
7. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
8. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
9. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
10. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
11. Were any sample containers received broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes ☒ No ☐

# of preserved  
bottles checked  
for pH:

( $<2$  or  $>12$  unless noted)

Adjusted? \_\_\_\_\_

Checked by: \_\_\_\_\_

### Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: \_\_\_\_\_

Date: \_\_\_\_\_

By Whom: \_\_\_\_\_

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: \_\_\_\_\_

Client Instructions: \_\_\_\_\_





17. Additional remarks:

### 18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.4	Good	Yes			

Chain-of-Custody Record		Turn-Around Time:
Client: <u>Animas Environmental Services LLC</u>	<input checked="" type="checkbox"/> Standard	<input type="checkbox"/> Rush
Mailing Address: <u>624 E Comanche Farmington NM 87401</u>	Project Name: <u>CoP Bunny ET AL #1</u>	
Phone #: <u>505 564 2281</u>	Project #:	
email or Fax#:	Project Manager: <u>D. Watson</u>	
QA/QC Package:	Sampler: <u>C. Lammeman</u>	
<input checked="" type="checkbox"/> Standard	<input type="checkbox"/> Level 4 (Full Validation)	On Ice: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Accreditation	Sample Temperature: <u>1.4</u>	
<input type="checkbox"/> NELAP	<input type="checkbox"/> Other _____	
<input type="checkbox"/> EDD (Type) _____		

[illegible]

Date:	Time:	Relinquished by:	Received by:	Date	Time
9/17/13	17:08			9/17/13	17:08
Date:	Time:	Relinquished by:	Received by:	Date	Time
9/17/13	17:41			09/18/13	1:00

☒ Standard ☐ Rush

CoP Bunny ET AL #1

Project #:

Project Manager:

D. Watson

Sampler: C. Lammeman

On Ice: ☒ Yes ☐ No

Sample Temperature: 1.4

HEAL No.

1309739

-00/

BTEX + ~~toluene~~ + ~~toluene~~ (8021)

BTEX + MTBE + TPH (Gas only)

TPH 8015B (GRO) (DRO) (MRO)

TPH (Method 418.1)

EDB (Method 504.1)

PAH's (8310 or 8270 SIMS)

RCRA 8 Metals

Anions (F, Cl, NO<sub>3</sub>, NO<sub>2</sub>, PO<sub>4</sub>, SO<sub>4</sub>)

8081 Pesticides / 8082 PCB's

8260B (VOA)

8270 (Semi-VOA)

$$X \quad 300.0 \text{ chlorides}$$

Air Bubbles (Y or N)



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

4901 Hawkins NE - Albuquerque, NM 87109

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

## Analysis Request

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

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., 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  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

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 Burlington Resources	Contact Patsy Clugston	
Address 3401 East 30 <sup>th</sup> St., Farmington, NM 87402	Telephone No. 505-326-9518	
Facility Name Bunny Et Al #1	Facility Type Gas Well	
Surface Owner Navajo Tribe – Allotted	Mineral Owner 1-149-IND-8464	API No. 30-045-06609

#### LOCATION OF RELEASE

Unit Letter P	Section 10	Township 27N	Range 9W	Feet from the 1040	North/South Line South	Feet from the 1190	East/West Line East	County San Juan
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Latitude 36.58562 Longitude -107.77059

#### NATURE OF RELEASE

Type of Release BGT CLOSURE SUMMARY	Volume of Release N/A	Volume Recovered N/A
Source of Release N/A	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour N/A	
Was a Watercourse Reached? N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.\*

N/A

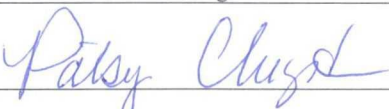
Describe Cause of Problem and Remedial Action Taken.\*

N/A

Describe Area Affected and Cleanup Action Taken.\*

BGT CLOSURE: NO RELEASE FOUND UPON REMOVAL

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: Patsy Clugston	Approved by Environmental Specialist:		
Title: Staff Regulatory Technician	Approval Date:	Expiration Date:	
E-mail Address: Patsy.L.Clugston@conocophillips.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 4-22-15	Phone: 505-326-9518		

\* Attach Additional Sheets If Necessary