

District I
1625 N. French Dr., Hobbs, NM 88240
District II
871 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
Proposed Alternative Method Permit or Closure Plan Application

OIL CONS. DIV DIST. 3

- Type of action: Below grade tank registration
 Permit of a pit or proposed alternative method
 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

SEP 24 2015

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: ConocoPhillips Company OGRID #: 14538
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: San Juan 29-5 Unit 55
API Number: 30-039-20458 OCD Permit Number: _____
U/L or Qtr/Qtr M (SWSW) Section 18 Township 29N Range 05W County: Rio Arriba
Center of Proposed Design: Latitude 36.7213287°N Longitude -107.4041977°W NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
 Permanent Emergency Cavitation P&S
 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 _____

DENIED
No Closure Completion Date, no C-141 required by 19.15.17.13 B(4) NMAC (2008)
BY: Jonathan Kelly and tank size does not match approved permit.
DATE: 10/5/2015 (505) 334-6178 Ext. 122
How Chloride Drilling Fluid yes no
Please Review, Revise and Resubmit.

3.
 Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 40 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 _____

26 pc

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.

Variations 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

<p>Within 100 feet of a wetland. - 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><u>Temporary Pit Non-low chloride drilling fluid</u></p>	
<p>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</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. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland. - 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><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p>	
<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). - Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland. - 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

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 H₂S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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	<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

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 Application (including closure plan and site conditions (see attachment))
OCD Representative Signature: _____ **Approval Date:** _____
Title: _____

DENIED

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: _____

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 _____ Longitude _____ °W NAD: 1927 1983

22.

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): Arleen White Title: Staff Regulatory Technician

Signature: Arleen White Date: 9/23/15

e-mail address: Arleen.R.White@conocophillips.com Telephone: (505) 326-9517

**ConocoPhillips Company
San Juan Basin
Below Grade Tank Closure Report**

Lease Name: SAN JUAN 29-5 UNIT 55

API No.: 30-039-20458

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. COPC 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. COPC 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. COPC 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 COPC 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. COPC 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.

9/23/2015

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). Form C-141 is 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 COPC or the division determines that a release has occurred, then COPC 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 COPC 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:
- i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

11. The surface owner shall be notified of COPC'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 was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

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.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. COPC 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 was 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 was backfilled and more than four feet of cover was achieved and the cover 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**)

White, Arleen R

From: White, Arleen R
Sent: Friday, July 17, 2015 8:00 AM
To: Cory Smith; Brandon Powell; 'Mark Kelly'; SJBU E-Team
Cc: GRP:SJBU Regulatory; Trujillo, Fasho D; Baird, Stephen J
Subject: SAN JUAN 29-5 UNIT 55 - 72 HOUR NOTICE

Subject: BGT Clousure 72 Hr Notification

Anticipated Start Date: Wednesday, July 22, 2015 @ approximately 10:00 am

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name: San Juan 29-5 Unit 55

API#: 30-039-20458

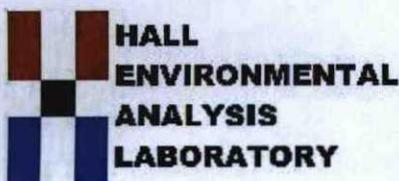
Location: UL M, Sec. 18, T29N, R05W

Footages: 1100' FSL & 860' FWL

Operator: BR **Surface Owner:** BLM



Arleen White
Staff Regulatory Technician
San Juan Business Unit
Ph: (505)326-9517
Cell: (505) 215-3985
arleen.r.white@conocophillips.com



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

July 31, 2015

Deborah Watson
Rule Engineering LLC
501 Airport Dr., Ste 205
Farmington, NM 87401
TEL: (505) 860-2712
FAX

RE: San Juan 29-5 Unit 55

OrderNo.: 1507B27

Dear Deborah Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 7/23/2015 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 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 black ink, appearing to read "Andy Freeman", is written over a light-colored background.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1507B27

Date Reported: 7/31/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Rule Engineering LLC

Client Sample ID: SC-1

Project: San Juan 29-5 Unit 55

Collection Date: 7/22/2015 11:07:00 AM

Lab ID: 1507B27-001

Matrix: SOIL

Received Date: 7/23/2015 8:05:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH							Analyst: TOM
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	7/29/2015	20488
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	ND	1.5		mg/Kg	1	7/29/2015 11:28:04 AM	20513
EPA METHOD 8260B: VOLATILES SHORT LIST							Analyst: DJF
Benzene	ND	0.050		mg/Kg	1	7/27/2015 5:20:57 PM	20434
Toluene	ND	0.050		mg/Kg	1	7/27/2015 5:20:57 PM	20434
Ethylbenzene	ND	0.050		mg/Kg	1	7/27/2015 5:20:57 PM	20434
Xylenes, Total	ND	0.099		mg/Kg	1	7/27/2015 5:20:57 PM	20434
Surr: 1,2-Dichloroethane-d4	106	70-130		%REC	1	7/27/2015 5:20:57 PM	20434
Surr: 4-Bromofluorobenzene	103	70-130		%REC	1	7/27/2015 5:20:57 PM	20434
Surr: Dibromofluoromethane	115	70-130		%REC	1	7/27/2015 5:20:57 PM	20434
Surr: Toluene-d8	96.3	70-130		%REC	1	7/27/2015 5:20:57 PM	20434

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
	D	Sample Diluted Due to Matrix	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	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1507B27
31-Jul-15

Client: Rule Engineering LLC
Project: San Juan 29-5 Unit 55

Sample ID	MB-20513	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	20513	RunNo:	27852					
Prep Date:	7/29/2015	Analysis Date:	7/29/2015	SeqNo:	837706	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-20513	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	20513	RunNo:	27852					
Prep Date:	7/29/2015	Analysis Date:	7/29/2015	SeqNo:	837707	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	98.5	90	110			

Sample ID	1507B27-001AMS	SampType:	MS	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-1	Batch ID:	20513	RunNo:	27852					
Prep Date:	7/29/2015	Analysis Date:	7/29/2015	SeqNo:	837712	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	99.1	64.2	131			

Sample ID	1507B27-001AMSD	SampType:	MSD	TestCode:	EPA Method 300.0: Anions					
Client ID:	SC-1	Batch ID:	20513	RunNo:	27852					
Prep Date:	7/29/2015	Analysis Date:	7/29/2015	SeqNo:	837713	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	98.0	64.2	131	1.09	20	

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | |

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: 1507B27
 31-Jul-15

Client: Rule Engineering LLC
Project: San Juan 29-5 Unit 55

Sample ID MB-20488	SampType: MBLK		TestCode: EPA Method 418.1: TPH							
Client ID: PBS	Batch ID: 20488		RunNo: 27831							
Prep Date: 7/28/2015	Analysis Date: 7/29/2015		SeqNo: 836825				Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID LCS-20488	SampType: LCS		TestCode: EPA Method 418.1: TPH							
Client ID: LCSS	Batch ID: 20488		RunNo: 27831							
Prep Date: 7/28/2015	Analysis Date: 7/29/2015		SeqNo: 836826				Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	86	20	100.0	0	85.6	83.6	116			

Sample ID LCSD-20488	SampType: LCSD		TestCode: EPA Method 418.1: TPH							
Client ID: LCSS02	Batch ID: 20488		RunNo: 27831							
Prep Date: 7/28/2015	Analysis Date: 7/29/2015		SeqNo: 836827				Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	87	20	100.0	0	87.0	83.6	116	1.55	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1507B27

31-Jul-15

Client: Rule Engineering LLC

Project: San Juan 29-5 Unit 55

Sample ID mb-20434	SampType: MBLK		TestCode: EPA Method 8260B: Volatiles Short List							
Client ID: PBS	Batch ID: 20434		RunNo: 27785							
Prep Date: 7/24/2015	Analysis Date: 7/27/2015		SeqNo: 835422				Units: mg/Kg			
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: 1,2-Dichloroethane-d4	0.51		0.5000		103	70	130			
Surr: 4-Bromofluorobenzene	0.48		0.5000		97.0	70	130			
Surr: Dibromofluoromethane	0.54		0.5000		107	70	130			
Surr: Toluene-d8	0.47		0.5000		94.4	70	130			

Sample ID lcs-20434	SampType: LCS		TestCode: EPA Method 8260B: Volatiles Short List							
Client ID: LCSS	Batch ID: 20434		RunNo: 27785							
Prep Date: 7/24/2015	Analysis Date: 7/27/2015		SeqNo: 835423				Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.99	0.050	1.000	0	99.2	70	130			
Toluene	0.95	0.050	1.000	0	95.3	70	130			
Surr: 1,2-Dichloroethane-d4	0.53		0.5000		106	70	130			
Surr: 4-Bromofluorobenzene	0.50		0.5000		99.5	70	130			
Surr: Dibromofluoromethane	0.52		0.5000		105	70	130			
Surr: Toluene-d8	0.46		0.5000		91.6	70	130			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Sample Log-In Check List

Client Name: **RULE ENGINEERING LL** Work Order Number: **1507B27** RcptNo: 1

Received by/date: *G.A.* *07/23/15*
 Logged By: **Ashley Gallegos** **7/23/2015 8:05:00 AM**
 Completed By: **Ashley Gallegos** **7/23/2015 5:40:33 PM**
 Reviewed By: *CS* *07/24/15*

AG
AG

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° C to 6.0°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 # of preserved bottles checked for pH: (<2 or >12 unless noted)
- 13. Are matrices correctly identified on Chain of Custody? Yes No Adjusted?
- 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 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 °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Chain-of-Custody Record

Client: Rule Engineering LLC

Mailing Address: 501 Airport Drive

Farmington NM 87401

Phone #: 505 860 2712

Email or Fax#:

QA/QC Package:

Standard Level 4 (Full Validation)

Accreditation

NELAP Other

EDD (Type)

Project Manager:

D Watson

Sampler: D Watson

On Ice: Yes No

Sample Temperature: 1.0

Date Time Matrix Sample Request ID

2/2/15 1107 801 SC-1

Container Type and #

1-4oz Cold

Preservative Type

1507B27
-001

HEAL No.

Turn-Around Time:

Standard Rush

Project Name:

San Juan 29-5 Unit 55

Project #:

4901 Hawkins NE - Albuquerque, NM 87109

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

Analysis Request

<input checked="" type="checkbox"/>	BTEX + MTBE + TPH (Gas only)	
<input checked="" type="checkbox"/>	BTEX + MTBE + TPH (Gas only)	
<input type="checkbox"/>	TPH 8015B (GRO / DRO / MRO)	
<input checked="" type="checkbox"/>	TPH (Method 418.1)	
<input type="checkbox"/>	EDB (Method 504.1)	
<input type="checkbox"/>	PAH's (8310 or 8270 SIMS)	
<input type="checkbox"/>	RCRA 8 Metals	
<input type="checkbox"/>	Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)	
<input type="checkbox"/>	8081 Pesticides / 8082 PCB's	
<input type="checkbox"/>	8260B (VOA)	
<input type="checkbox"/>	8270 (Semi-VOA)	<u>X</u>
<input type="checkbox"/>	Air Bubbles (Y or N)	<u>X</u>

Date:	Time:	Relinquished by:	Received by:	Date	Time	Remarks:
<u>2/2/15</u>	<u>1700</u>	<u>Robert Waeter</u>	<u>Shirley Waeter</u>	<u>7/22/15</u>	<u>1700</u>	<u>Call to Crues Phillips</u>
Date:	Time:	Relinquished by:	Received by:	Date	Time	
<u>2/2/15</u>	<u>1748</u>	<u>Shirley Waeter</u>	<u>Shirley Waeter</u>	<u>07/23/15</u>	<u>0805</u>	<u>approve</u>

K Garcia
M. H. H. H. H. H.
out code: T110
Lead: Fasno Trujillo
Denny Padden

change code: 10381221

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 this analytical report.

Rule Engineering, LLC

Solutions to Regulations for Industry

September 22, 2015

Ms. Lisa Hunter
ConocoPhillips
San Juan Business Unit
5525 Highway 64
Farmington, New Mexico 87401

**Re: San Juan 29-5 Unit 55
Below Grade Tank Closure Sampling Report**

Dear Ms. Hunter:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips San Juan 29-5 Unit 55, located in Unit Letter M, Section 18, Township 29N, Range 5W in Rio Arriba County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from beneath the BGT on July 22, 2015. A topographic map of the location is included as Figure 1 and an aerial site map is included as Figure 2.

BGT Summary

Site Name – San Juan 29-5 Unit 55

Location – Unit Letter M, Section 18, Township 29N, Range 5W

API Number – 30-039-20458

Wellhead Latitude/Longitude – N36.72144 and W107.40489

BGT Latitude/Longitude – N36.72131 and W107.40456

Land Jurisdiction – Bureau of Land Management

Size of BGT – 40 barrels

Date of BGT Closure Soil Sampling – June 22, 2015

BGT Closure Standards

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the San Juan 29-5 Unit 55 are as follows: 0.2 mg/kg benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 100 mg/kg total petroleum hydrocarbons (TPH).

Field Activities

On July 22, 2015, following removal of the BGT tank and gravel, Rule personnel conducted a visual inspection for surface/subsurface indications of a release. No evidence of a release was observed. Rule personnel then collected five soil samples (S-1 through S-5) from 0.5 feet beneath the BGT liner. Figure 2 provides the location of the soil samples collected from below the BGT. The field work summary sheet is attached.

Soil Sampling

The five soil samples (S-1 through S-5) collected from below the BGT liner were combined to create soil confirmation sample SC-1. A portion of SC-1 was field screened for volatile organic compounds (VOCs) and chlorides, and field analyzed for total petroleum hydrocarbons (TPH) per U.S. Environmental Protection Agency (USEPA) Method 418.1.

The portion of SC-1 collected for laboratory analysis was placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The sample was analyzed for BTEX per USEPA Method 8021B, TPH per USEPA Method 418.1, and chlorides per USEPA Method 300.0.

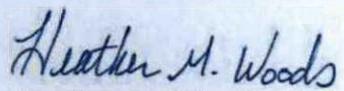
Field sampling results for soil confirmation sample SC-1 reported VOCs at 4.2 ppm and TPH concentrations at 21.8 mg/kg. Field chloride concentrations were reported at 80 mg/kg. Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations as less than 0.050 mg/kg and 0.249 mg/kg, respectively. Laboratory analytical results for SC-1 reported concentrations of less than 20.0 mg/kg TPH and less than 1.5 mg/kg chloride. Field and laboratory results for SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On July 22, 2015, BGT closure sampling activities were conducted at the ConocoPhillips San Juan 29-5 Unit 55. Field and laboratory results for sample SC-1 were reported below the BGT closure standards for benzene, total BTEX, TPH, and chlorides as outlined in 19.15.17.13.NMAC. Based on field sampling and laboratory analytical results, no release occurred from the BGT and no further work is recommended.

Rule Engineering appreciates the opportunity to provide services to ConocoPhillips. If you have any questions, please contact me at (505) 325-1055.

Sincerely,
Rule Engineering, LLC


Heather M. Woods, P.G.

Ms. Lisa Hunter
San Juan 29-5 Unit 55
September 22, 2015
Page 3 of 3

Attachments:

Table 1. Soil Sampling Results-VOCs, Benzene, Total BTEX, and TPH

Figure 1. Topographic Map

Figure 2. Aerial Site Map

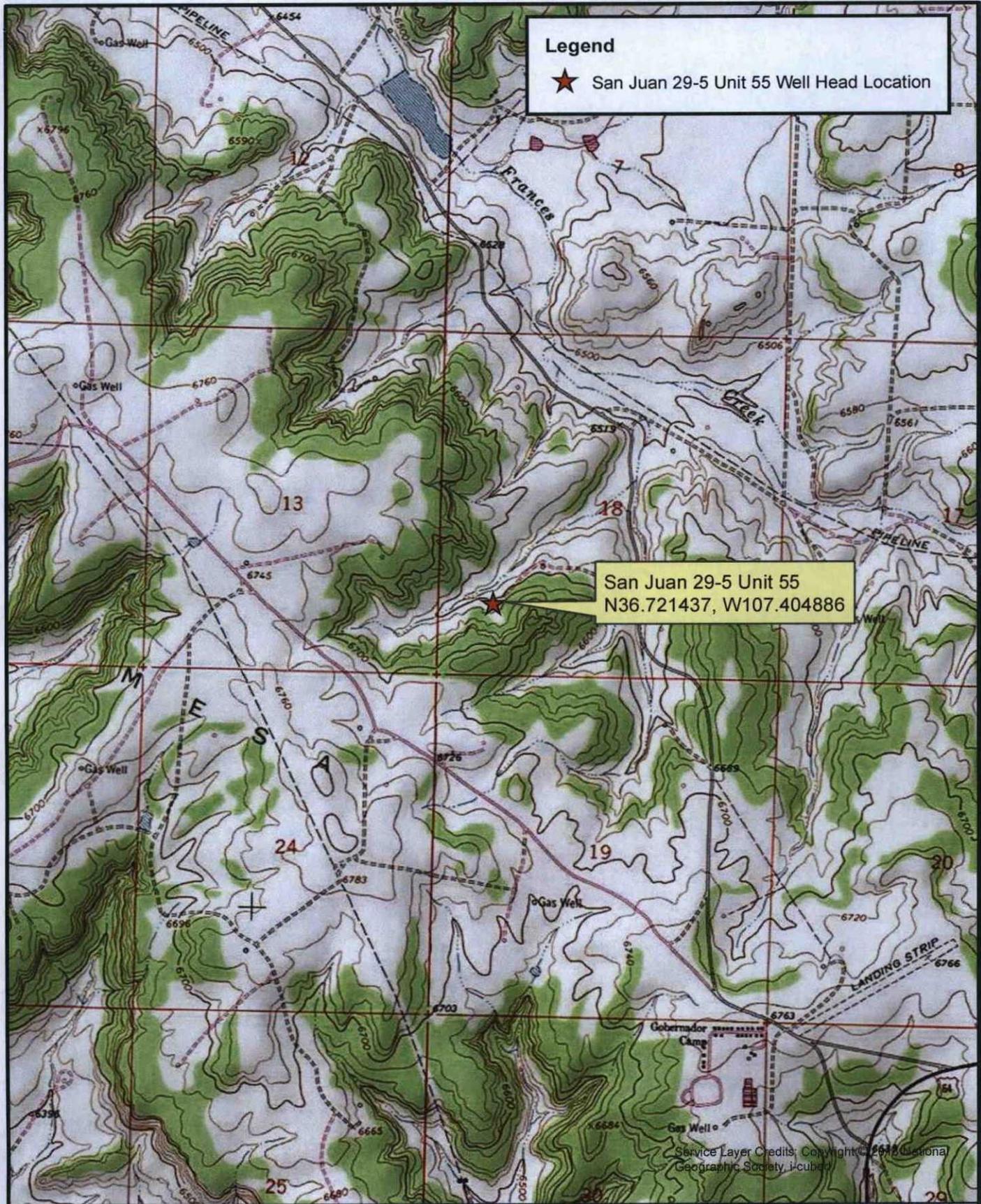
Field Work Summary Sheet

Analytical Laboratory Report

Table 1. BGT Soil Sampling Results
San Juan 29-5 Unit 55
Rio Arriba County, New Mexico
ConocoPhillips

Sample ID	Date	Sample Type	Sample Depth (ft below BGT liner)	Field Sampling Results			Laboratory Analytical Results			
				VOCs (PID) (ppm)	TPH (mg/kg)	Chloride (mg/kg)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
BGT Closure Standards*				---	100	250	0.2	50	100	250
SC-1	Jul 22, 15	composite	0.5	4.2	21.8	80	<0.050	<0.249	<20.0	<1.5

Notes: PID - photo-ionization detector
 ppm - parts per million
 mg/kg - milligrams/kilograms
 VOCs - volatile organic compounds
 TPH-total petroleum hydrocarbons per USEPA Method 418.1
 BTEX - benzene, toluene, ethylbenzene, and total xylenes
 *19.15.17.13 NMAC

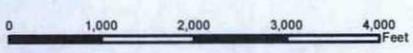


Legend
 ★ San Juan 29-5 Unit 55 Well Head Location

San Juan 29-5 Unit 55
 N36.721437, W107.404886

Service Layer Credits: Copyright © 2010 National Geographic Society (cuba)

Rule Engineering, LLC
 Solutions to Regulations for Industry



Location
 M-18-29N-5W
 N36.721437, W107.404886
 Rio Arriba County, New Mexico

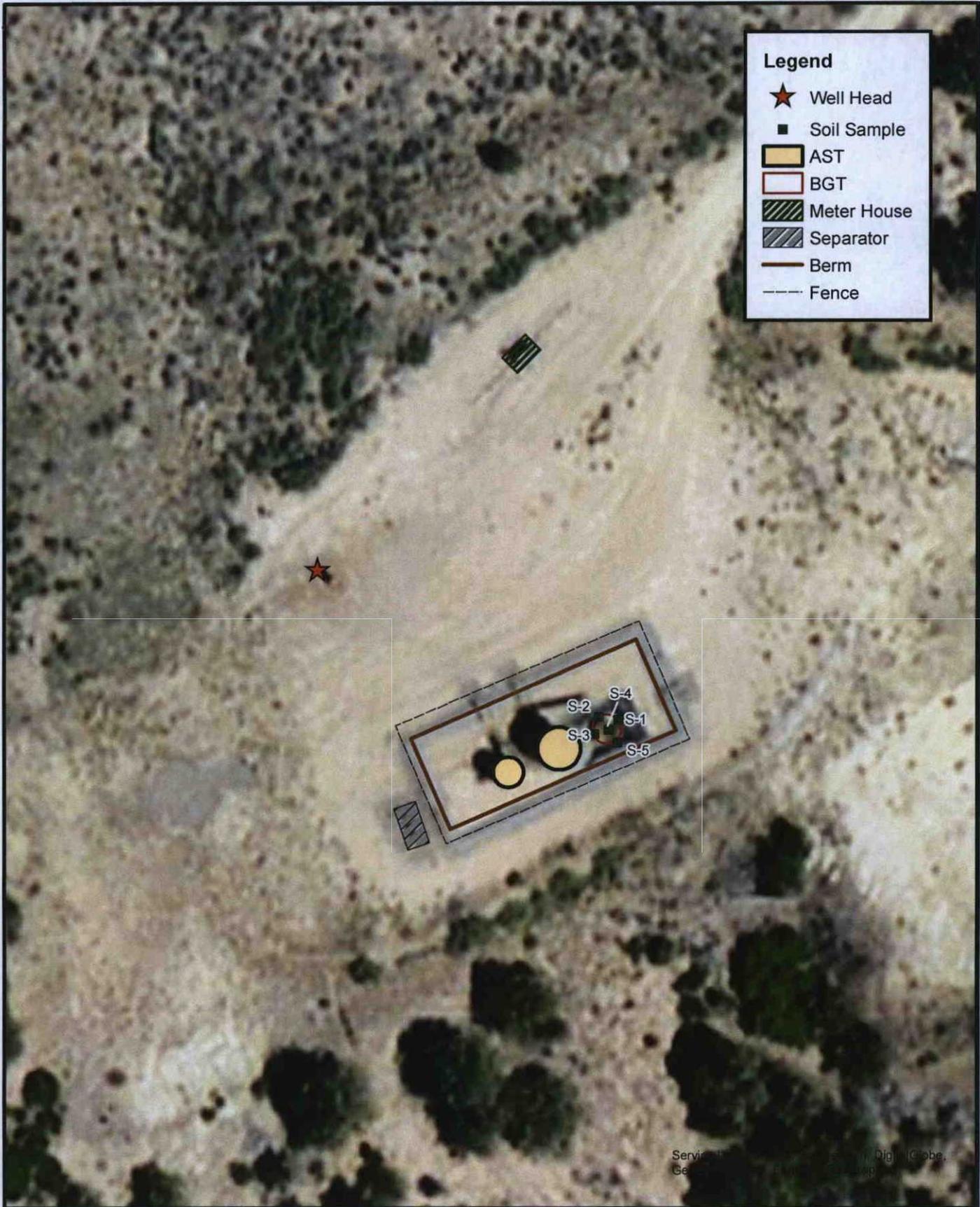
Topographic Map
 ConocoPhillips
 San Juan 29-5 Unit 55
 API: 30-039-20458

Date: 7/31/2015 File: 150731 SJ 29-5 #55 Topographic Map

Figure: 1

Legend

- ★ Well Head
- Soil Sample
- AST
- BGT
- ▨ Meter House
- ▧ Separator
- Berm
- - - Fence



Service by Digital Globe
 Generated by GeoEye

<p>Rule Engineering, LLC Solutions to Regulations for Industry</p>	<p>0 20 40 60 80 Feet</p>	<p>Location M-18-29N-5W N36.721437, W107.404886 Rio Arriba County, New Mexico</p>	<p>Aerial Site Map ConocoPhillips San Juan 29-5 Unit 55 API: 30-039-20458</p>
		<p>Date: 9/21/2015 File: 150731 SJ 29-5 #55 Aerial Map</p>	<p>Figure: 2</p>

Rule Engineering Field Work Summary Sheet

Company: ConocoPhillips
 Location: San Juan 29-5 Unit 55
 API: 30-039-20458
 Legals: M-18-29N-5W
 County: Rio Arriba
 Land Jurisdiction: BLM

Date: 22-Jul-15
 Staff: Sean Norris
 Debbie Watson

Wellhead GPS: 36.72131, -107.40456
 BGT GPS: 36.72144, -107.40489

Siting Information based on BGT Location:

Site Rank

Groundwater: 70 ft-Cathodic for location
 Surface Water: Unnamed wash located approximately 365 ft NW of BGT
 Wellhead Protection: No wells identified within 1,000 foot radius

Objective: Closure sampling for BGT
 Tank Size: 40 bbls (removed while onsite)
 Liner: Yes. 4-6 inches of gravel and mud below tank.
 Observations: No staining or indication of a release.
 Notes: NMOCD scheduled to attend closure at 10 am. Waited until 10:40 am before proceeding w/o NMOCD representative.

Field Sampling Information

Name	Type of Sample	Collection Time	Collection Location	VOCs ¹ (ppm)	VOCs time	TPH ² mg/kg	TPH Time	Chloride ³ mg/kg	Chloride Time
SC-1	composite	11:07	see below	4.2	11:18	21.8	11:20	80	11:25

SC-1 is a 5-point composite of S-1 through S-5, collected 0.5 ft below tank liner.
 Sample SC-1 was laboratory analyzed for TPH (418.1), BTEX (8021) and chlorides (300.0).



Field Sampling Notes:

- ¹ Field screening for volatile organic compounds (VOC) vapors was conducted with a photo-ionization detector (PID). Before beginning field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas.
- ² Field analysis for TPH was conducted using a total hydrocarbon analyzer. Prior to field analysis, the machine was calibrated following the manufacturer's procedure which includes calculation of a calibration curve using known concentration standards.
- ³ Field screening for chlorides was conducted using the Hach chloride low range test kit. Chloride concentrations are determined by drop count titration method using silver nitrate titrant.

ConocoPhillips Co.

LATITUDE LONGITUDE
N36°43'16" W107°24'14"

SAN JUAN 29 - 5 UNIT NO 55

LEASE NO SF 078277

ELEV. 6593'GL

1100'S, 860'W. SEC. 18, T 29 N, R 5 W, N.M.P.M.

RIO ARRIBA COUNTY, NEW MEXICO

EMERGENCY NUMBER (505) 324-5170⁵⁸

