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
# Proposed Alternative Method Permit or Closure Plan Application

13119

OIL CONS. DIV DIST. 3

SEP 21 2015

Type of action: 45-30985
- ☐ 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

***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: Enterprise Field Services OGRID #: 151618
Address: P.O. Box 4324 c/o Environmental Department Houston, Texas 77210
Facility or well name: San Juan 32-8 Unit 264H
API Number: 30-045-30985 OCD Permit Number:
U/L or Qtr/Qtr L Section 9 Township 32N Range 8W County: San Juan
Center of Proposed Design: Latitude 36.998072 Longitude -107.685856 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&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: 20 bbl Type of fluid: lube oil
Tank Construction material: double wall, double bottom, steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____mil ☐ HDPE ☐ PVC ☐ Other _____

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_____



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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.**<br>- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| **Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**<br>NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ 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)**<br>- 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)**<br>- 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)**<br>- 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)**<br>- 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).<br>- 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;.<br>- 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.)<br>- 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.<br>- 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.<br>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |

| | |
|---|---|
| Within 100 feet of a wetland.<br>- 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).<br>- 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.<br>- 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;<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 300 feet of a wetland.<br>- 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).<br>- 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.<br>- 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.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- 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 $H_2S$, 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.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No<br>☐ 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).<br>- 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.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ 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.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance | |

| | |
|---|---|
| adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- 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.<br>- 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 Application (including closure plan) ☒ Closure ~~Plan (only)~~ ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** Jonathan D. Kelly **Approval Date:** 10/5/2015

**Title:** Compliance Officer **OCD 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:** April 2, 2015

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)

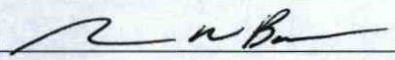
On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐1927 ☐ 1983

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): Graham Bacon Title: Group Sr. Vice President

Signature:  Date: 9-15-2015

e-mail address: snolan@eprod.com Telephone: 713-381-6595

**Enterprise Field Services**
**San Juan Basin of New Mexico**
Below Grade Tank Closure Plan/**Below-Grade Tank Closure Report**
**San Juan 32-8 Unit 264H**
**Unit Letter L, Section 9, T32N, R8W**
**San Juan County, New Mexico**

The following plan outlines Enterprise Field Services (Enterprise) proposed closure method and proposed procedures and protocols to implement and complete below-grade tank (BGT) closures on Enterprise locations in the San Juan Basin of New Mexico. This plan had been developed in accordance with Rule 19.15.17.13 NMAC. Enterprise will not commence closure without first obtaining approval of the closure plan from the New Mexico Oil Conservation Division (NMOCD) District III Office. If deviations from this plan are necessary, Enterprise will request preapproval from the District III Office of any specific changes. Additional changes/deviations will be included on Form C-144.

**Cory Smith, NMOCD, approved the Enterprise BGT Closure Plan on January 9, 2015.**

**Closure Notice**

1. Enterprise will notify the surface owner by certified mail, return receipt requested, that Enterprise plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. The notice will include well /facility name, API number (if associated with a particular well) and location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.

   **Enterprise notified B Square Ranch, LLC, prior to BGT closure. The notification is attached.**

2. (Approved Variance) Enterprise requests notification procedures for notifying NMOCD District III office and all public surface owners (BLM, Tribal or State) by email that Enterprise plans closure operations at least 72 hours, but not more than one week, prior to any closure operation activity, instead of by certified mail. The notices will include well/facility name, API number (if associated with a particular well) and location.

   **Enterprise sent notification to the District III Office via email on March 19, 2015. Mr. Jonathon Kelly, NMOCD, was present during BGT removal and soil sampling activities. The notification is attached.**

**Closure Method**

3. Within 60 days of cessation of operations, Enterprise will remove liquids and sludge (contents) from the BGT prior to implementing a closure method and will dispose of the liquids and sludge in a NMOCD-approved facility. The liquids and sludge will be shoveled and/or vacuumed from the BGT and disposed at one of the following facilities, depending on proximity to the BGT site:
   - Envirotech Land Farm (Permit #NM-01-011)
   - Basin Disposal (Permit #NM-01-0005)
   - JFJ Landfarm, LLC- Industrial Ecosystems Inc.(Permit #NM-01-010-B)

   **The BGT was dry. No fluids or sludge were removed from the tank during closure activities.**

4. Within six months of cessation of operations, Enterprise will remove the BGT and dispose of it in a NMOCD-approved facility or recycle, reuse, or reclaim it in a manner that the Division III Office

approves. Documentation as to the final disposition of the removed BGT will be included within the final closure report. If there is any on-site equipment associated the BGT, Enterprise will remove the equipment, unless the equipment is required for some other purpose. Enterprise anticipates that steel materials will be recycled or reused as approved by NMOCD. Liner materials (if applicable) will be cleaned to remove soils and/or contaminated material for disposal as solid waste. Solid waste will be disposed of at the San Juan Regional Landfill (Permit #SWM-052426).

**The tank and associated barricade was transported to the Enterprise Farmington Warehouse Yard for storage until reuse.**

5. Following removal of the BGT, Enterprise will test the soils beneath the BGT as follows:
   - At a minimum, Enterprise will collect a five point composite sample to include any obvious stained or wet soils, or other evidence of contamination under the BGT. The sample will be analyzed for the constituents listed in Table I of 19.15.17.13 NMAC (see next page).

**A five point composite sample (SC-1) was collected from beneath the BGT following BGT removal. Mr. Jonathan Kelly, NMOCD, was onsite during soil sampling activities. No obvious stained or wet soils were observed below the BGT. The sample was submitted to Hall Environmental Analysis Laboratory, Albuquerque, NM, for analysis of the constituents listed in Table 1 of 19.15.17.13 NMAC. A summary of the field work is attached.**

6. If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, Enterprise will notify the District III Office of the results. Enterprise will not continue with BGT closure activities until approval has been granted by the District III Office. Enterprise acknowledges that additional delineation may be required.

**Laboratory results for benzene, BTEX, TPX, GRO + DRO, and chlorides were reported below the applicable NMOCD remediation standards. Sampling results indicate no release occurred from the BGT. The laboratory analytical report is attached.**

**Laboratory analytical results for SC-1 are as follows:**

**Table 1. SC-1 Soil Sampling Results**

| Constituent | Method | Limit (mg/kg) (Groundwater > 100 feet ) | **Results (mg/kg)** |
|---|---|---|---|
| Chloride | EPA 300.0 | 20,000 | **3.9** |
| TPH | EPA SW-846 Method 418.1 | 2,500 | **<20** |
| GRO + DRO | EPA SW-846 Method 8015D | 1,000 | **<14.8** |
| BTEX | EPA SW-846 Method 8021B | 50 | **<0.24** |
| Benzene | EPA SW-846 Method 8021B | 10 | **<0.048** |

TPH= Total Petroleum Hydrocarbons
BTEX = benzene, toluene, ethylbenzene, and total xylenes
GRO = Gasoline range organics
DRO = Diesel range organics

7. If the results from the sampling demonstrate that all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, then Enterprise will proceed to backfill the excavation with non-waste containing, uncontaminated, earthen material.

   **The BGT location was backfilled with clean soil, following receipt of laboratory analytical results.**

**Stabilization (Areas needed for production operations):**

8. In areas reasonably needed for production operations, Enterprise will compact, cover, pave, or otherwise stabilize and maintain these areas in such a way as to minimize dust and erosion to the extent practicable. Reseeding will be completed upon facility closure and will follow the procedure below.

   **The BGT location was backfilled with clean soil and compacted to minimize dust and erosion on April 2, 2015. The BGT location will be reclaimed when it is no longer needed for production operations.**

**Reclamation (Areas no longer required for production operations or at facility closure):**

9. Enterprise will reclaim the BGT location and all areas associated with BGT including associated access roads, to a safe and stable condition that blends with the surrounding undisturbed area. Enterprise will substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in 19.15.17.13.H (2) NMAC, recontour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to 19.15.17.13.H. (5) NMAC.

   **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

10. Enterprise may propose an alternative to the re-vegetation or recontouring requirement if Enterprise can demonstrate to the District III Office that the proposed alternative provides equal or better prevention of erosion, and protection of fresh water, public health and the environment. The proposed alternative will be agreed upon by the surface owner. Enterprise will submit the proposed alternative, with written documentation that the surface owner agrees to the alternative, to the division for approval.

    **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

11. The soil cover for closures after site contouring, where Enterprise has removed the BGT, and if necessary remediated the soil beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, will consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

    **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

12. Enterprise will construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

    **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

13. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations, will be reclaimed as early and as nearly as practicable to their original condition or their final land use and will be maintained to control dust and minimize erosion to the extent practicable.

    **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

14. Enterprise will replace topsoils and subsoils to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area will be reseeded in the first favorable growing season following closure of the BGT.

    **The BGT location was backfilled with clean soil. The BGT location will be reclaimed when it is no longer needed for production operations.**

15. Reclamation of all disturbed areas no longer in use will be considered complete when all ground surface disturbing activities at the site have been completed, and 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.

    **Enterprise will seed/reclaim the BGT location once it is no longer needed for production operations.**

16. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of Enterprise subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.

    **Enterprise will seed/reclaim the BGT location once it is no longer needed for production operations.**

17. Enterprise will notify the District III Office when reclamation and re-vegetation have been completed at the site.

    **Enterprise will notify the District III Office when re-vegetation has been completed and is successful.**

**Closure Report**

18. Within 60 days of closure completion of the BGT, Enterprise will submit a closure report on Form C-144, with necessary attachments to document all closure activities. The closure report will contain the following attachments:

    - Proof of Closure Notice,
    - Confirmation Sampling Results,
    - Disposal Facility Name and Permit Number, and
    - Details on back-filling, capping and covering, where applicable.

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

    Enterprise will certify that all information in the report and attachments is correct and that Enterprise has complied with all applicable closure requirements and conditions specified in the approved closure plan.

    **Operator Closure Certification (Item 22) has been completed.**

**Attachments:**

**Landowner Notification**
**NMOCD Notification**
**Field Work Summary Sheet**
**Figure 1. Topographic Location Map**
**Figure 2. Aerial Site Map**
**Laboratory Analytical Report (#1503C79)**
**Photograph log**
**Below Grade Tank Registration Form C-144 (copy)**

ENTERPRISE

March 17, 2015

B Square Ranch, LLC
3901 Bloomfield Hwy.
Farmington, NM 87401-2831

Re: Below Grade Tank Closure
Enterprise Field Services, LLC
San Juan 32-8 #264 H
Unit Letter L, Section 8, T32N, R8W
San Juan County, New Mexico

Dear Mr. Bolack,

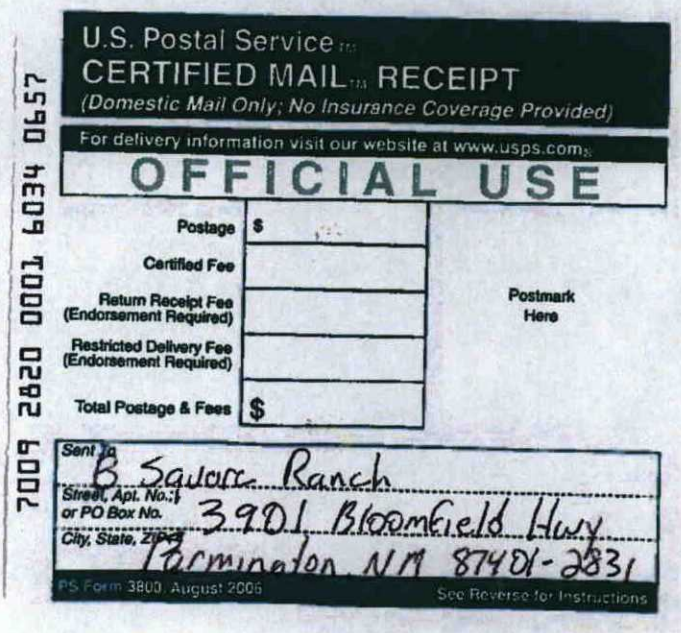
Enterprise Field Services, LLC has scheduled to remove a below ground tank per NMOCD requirements. The project area is all on the existing 32-8 #264 H well location and will take place on or around the 26th of March 2015. Project was previously scheduled for February 25th but was postponed due to weather

Please call me at (505) 599-2214 to answer any questions you may have concerning this project.

Your cooperation in this matter is appreciated.

Sincerely,

Michael G. Waszut
Sr. Land Representative



**From:** Long, Thomas
**Sent:** Monday, March 23, 2015 7:49 AM
**To:** 'Smith, Cory, EMNRD'
**Subject:** RE: SJ 32-8#264 H BGT

Cory,

They will start around 8:00 a.m.

Sincerely,

**Thomas J. Long**
**Senior Environmental Scientist**
**Enterprise Products Company**
**614 Reilly Ave.**
**Farmington, New Mexico 87401**
**505-599-2286 (office)**
**505-215-4727 (Cell)**
**tjlong@eprod.com**

**From:** Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]
**Sent:** Thursday, March 19, 2015 11:07 AM
**To:** Long, Thomas
**Subject:** RE: SJ 32-8#264 H BGT

Tom,

Thanks! Do you know the anticipated start time on the 26th?

**From:** Long, Thomas [mailto:tjlong@eprod.com]
**Sent:** Thursday, March 19, 2015 10:35 AM
**To:** Smith, Cory, EMNRD
**Subject:** RE: SJ 32-8#264 H BGT

Cory,

The well name is the SJ 32-8 Unit #264. It is located in UL L Section 9 T 32N R8W. It is a BGT associated with a compressor that Enterprise operates. The API for the well site is 30-045-32754.

**Thomas J. Long**
**Senior Environmental Scientist**
**Enterprise Products Company**
**614 Reilly Ave.**
**Farmington, New Mexico 87401**
**505-599-2286 (office)**
**505-215-4727 (Cell)**
**tjlong@eprod.com**

**From:** Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]
**Sent:** Thursday, March 19, 2015 10:29 AM
**To:** Long, Thomas
**Subject:** RE: SJ 32-8#264 H BGT

Tom,

Thank you for the closure Notification.

As described in 19.15.17.13.E(2) for future Closure notification please include:

- Operators Name
- Well Name
- API# (if associated with a particular well)
- Location to be closed by unit letter, section township and range

**From:** Long, Thomas [mailto:tjlong@eprod.com]
**Sent:** Thursday, March 19, 2015 10:17 AM
**To:** Smith, Cory, EMNRD
**Subject:** SJ 32-8#264 H BGT

Cory,

This email is to notify you that Enterprise has scheduled closure activities for the SJ 32-8#264 H BGT on Thursday, March 26, 2015. If you have any questions, please call or email.

Sincerely,

**Thomas J. Long**
**Senior Environmental Scientist**
**Enterprise Products Company**
**614 Reilly Ave.**
**Farmington, New Mexico 87401**
**505-599-2286 (office)**
**505-215-4727 (Cell)**
**tjlong@eprod.com**

---

**Field Work Summary Sheet**

| Rule Engineering |
|---|
| Date: 26-Mar-15 |
| Staff: Debbie Watson |
| Onsite: 8:30 |
| Offsite: 10:00 |

| | |
|---|---|
| Company: | Enterprise Products |
| Location: | San Juan 32-8 Unit 264H |
| Legals: | L-09-32N-08W |
| County: | San Juan |
| Land Ownership: | Private |

**Siting Information based on BGT Location:**

Groundwater: >100 feet

Surface Water: 650 W of location

Wellhead Protection: No wells/springs within 1-mile radius.

Site Rank: 10

**Site Information**

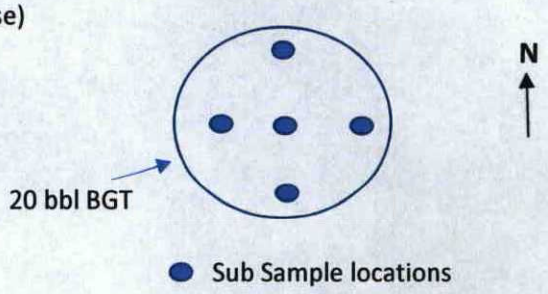
| | |
|---|---|
| BGT: | Below grade tank and barricade in place upon arrival. BGT empty. |
| Tank Size: | 20 bbl, double wall , double bottom , steel. No signs of corrosion holes. Tank in good repair. |
| BGT GPS: | N36.998072 and W107.685856 |
| API: | 30-45-30985 |

**Sample Information**

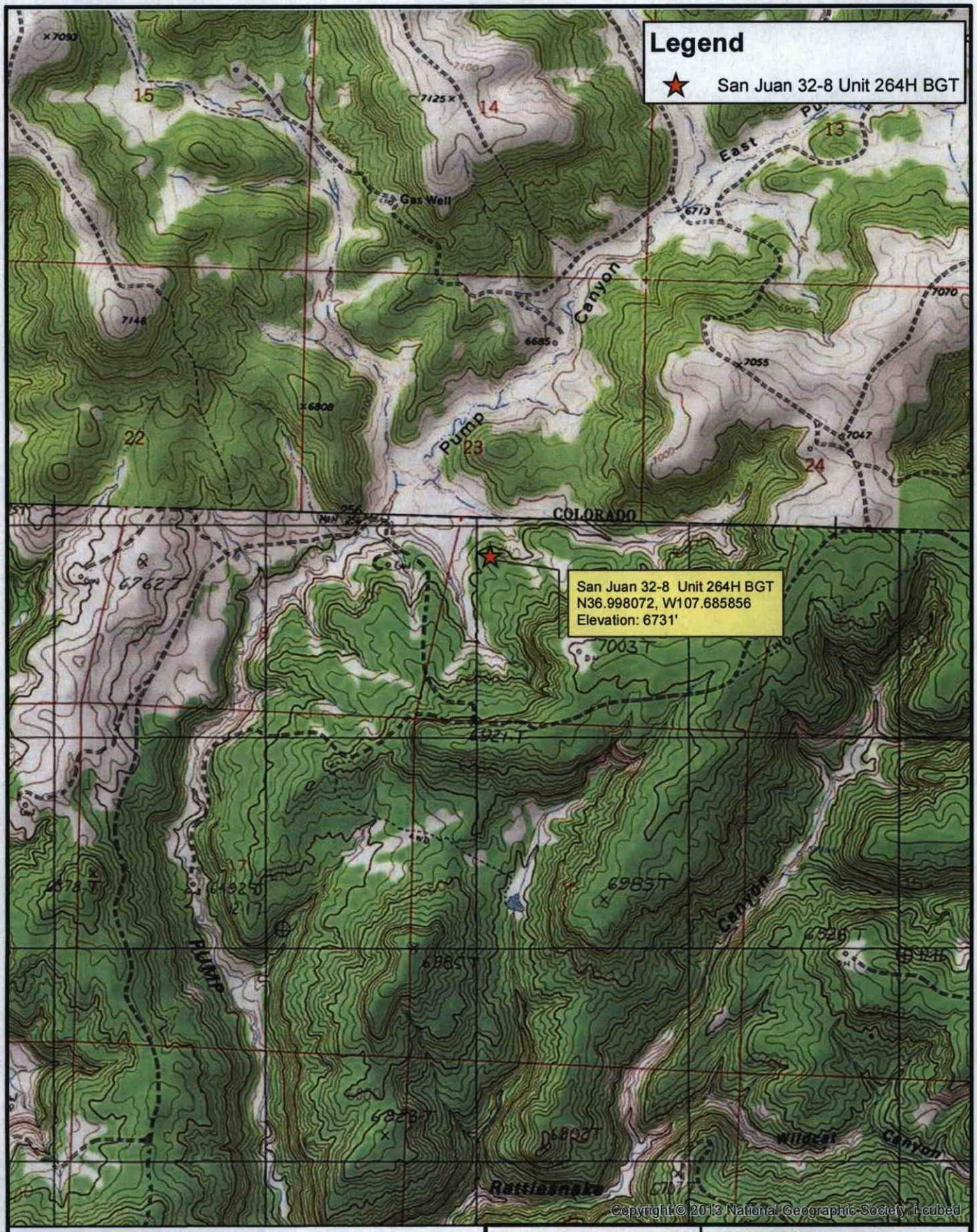
| Sample ID | Type of Sample | Collection Date/Time | Collection Location | Notes |
|---|---|---|---|---|
| SC-1 | Composite | 3/26/2015 9:50 | See image below. Five subsamples collected below BGT following removal. | No odor or staining below tank. No observed wet areas. |

Notes: Onsite: Jonathon Kelly (NMOCD), OFT, Alan Martinez (Enterprise)

Sample composited at 9:50, CoC completed. Sample stored on ice. Analyzed for BTEX, TPH (418.1), and GRO+DRO.




Rule Engineering, LLC
Solutions to Regulations for Industry




**Rule** Engineering, LLC
Solutions to Regulations for Industry

0 0.15 0.3 0.45 0.6 Miles

**Location**
L-9-32N-8W
N36.998072, W107.685856 (WGS84)
San Juan County, New Mexico

**Topographic Map**
Enterprise Products BGT Closure Report
San Juan 32-8 Unit 264H

Date: 4/24/2015 | File: 150413 Site Map topo | Figure: 1


Rule Engineering, LLC
Solutions to Regulations for Industry

0 10 20 30 40 Feet

N

**Location**
L-9-32N-8W
N36.998072, W107.685856 (WGS84)
San Juan County, New Mexico

**Aerial Site Map**
Enterprise Products BGT Closure Report
San Juan 32-8 Unit 264H

Date: 4/24/2015 | File: 150413 Soil Analytical Map and aerial | Figure: 2

**Photograph Log**
**San Juan 32-8 Unit 264H BGT Closure**
**Enterprise Products**

| | |
|---|---|
| Photograph #1 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: March 26, 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing E, Location sign, the Enterprise BGT is located along the northest side of the well pad. |

| | |
|---|---|
| Photograph #2 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: March 26, 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing NW, looking at BGT and barricade prior to closure activities at the location. |

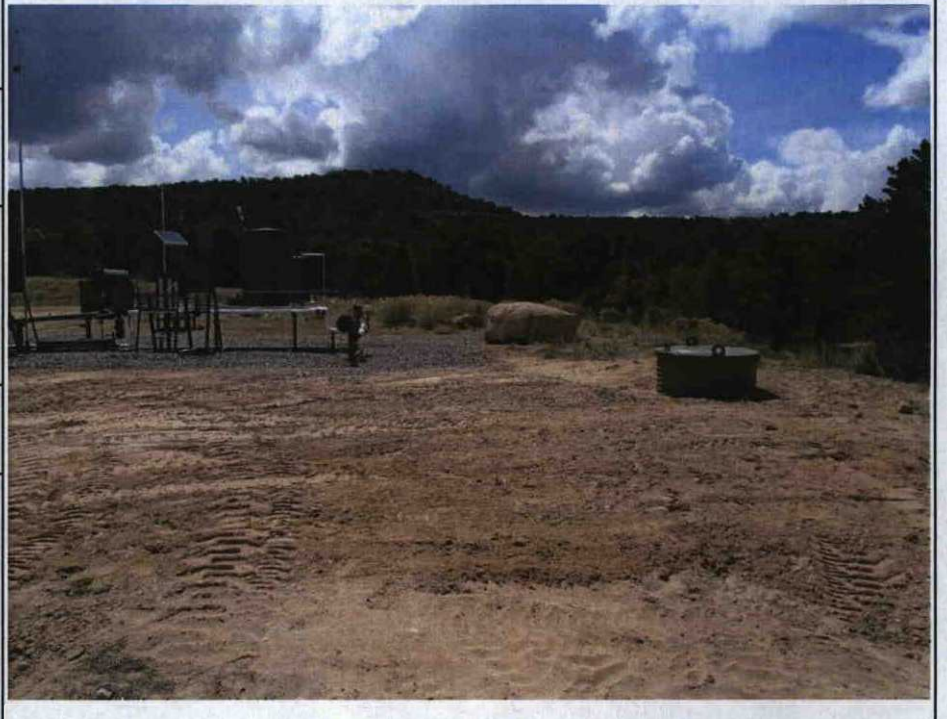
**Photograph Log**
**San Juan 32-8 Unit 264H BGT Closure**
**Enterprise Products**

| | |
|---|---|
| Photograph #3 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: March 26, 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing NE, Barricade and BGT have been removed. |

| | |
|---|---|
| Photograph #4 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: March 26 , 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing SE, looking into hole following BGT removal. No odors or staining were observed below the BGT. |

**Photograph Log**
**San Juan 32-8 Unit 264H BGT Closure**
**Enterprise Products**

| | |
|---|---|
| Photograph #5 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: April 16, 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing NW, looking at former BGT location. Area has been backfilled with clean fill dirt and compacted. |

| | |
|---|---|
| Photograph #6 |  |
| Client: Enterprise Products | |
| Site Name: San Juan 32-8 Unit 264H BGT Closure | |
| Date Photo Taken: April 16, 2015 | |
| Location: N36.998072, W107.685856 L-09-32N-08W San Juan County, New Mexico | |
| Photo Taken by: Deborah Watson | Description: Facing SE, looking at former BGT location. BGT location will be reclaimed once the area is no longer needed for production operations. |

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

April 01, 2015

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

RE: Enterprise San Juan 32-8 Unit 264H BGT OrderNo.: 1503C79

Dear Deborah Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 3/27/2015 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 qualifers 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,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

**Analytical Report**
Lab Order **1503C79**
Date Reported: **4/1/2015**

# Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** Rule Engineering LLC
**Client Sample ID:** SC-1
**Project:** Enterprise San Juan 32-8 Unit 264H BG
**Collection Date:** 3/26/2015 9:50:00 AM
**Lab ID:** 1503C79-001 **Matrix:** SOIL
**Received Date:** 3/27/2015 7:30:00 AM

| Analyses | Result | RL | Qual | Units | DF | Date Analyzed | Batch |
|---|---|---|---|---|---|---|---|
| **EPA METHOD 8015D: DIESEL RANGE ORGANICS** | | | | | | Analyst: **JME** | |
| Diesel Range Organics (DRO) | ND | 10 | | mg/Kg | 1 | 3/30/2015 9:59:19 PM | 18375 |
| Surr: DNOP | 113 | 63.5-128 | | %REC | 1 | 3/30/2015 9:59:19 PM | 18375 |
| **EPA METHOD 8015D: GASOLINE RANGE** | | | | | | Analyst: **NSB** | |
| Gasoline Range Organics (GRO) | ND | 4.8 | | mg/Kg | 1 | 3/30/2015 1:01:04 PM | 18386 |
| Surr: BFB | 92.4 | 80-120 | | %REC | 1 | 3/30/2015 1:01:04 PM | 18386 |
| **EPA METHOD 8021B: VOLATILES** | | | | | | Analyst: **NSB** | |
| Benzene | ND | 0.048 | | mg/Kg | 1 | 3/30/2015 1:01:04 PM | 18386 |
| Toluene | ND | 0.048 | | mg/Kg | 1 | 3/30/2015 1:01:04 PM | 18386 |
| Ethylbenzene | ND | 0.048 | | mg/Kg | 1 | 3/30/2015 1:01:04 PM | 18386 |
| Xylenes, Total | ND | 0.096 | | mg/Kg | 1 | 3/30/2015 1:01:04 PM | 18386 |
| Surr: 4-Bromofluorobenzene | 109 | 80-120 | | %REC | 1 | 3/30/2015 1:01:04 PM | 18386 |
| **EPA METHOD 300.0: ANIONS** | | | | | | Analyst: **SRM** | |
| Chloride | 3.9 | 1.5 | | mg/Kg | 1 | 3/31/2015 4:41:29 PM | 18435 |
| **EPA METHOD 418.1: TPH** | | | | | | Analyst: **JME** | |
| Petroleum Hydrocarbons, TR | ND | 20 | | mg/Kg | 1 | 3/31/2015 12:00:00 PM | 18381 |

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 Not In Range |
| 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#: **1503C79**

***01-Apr-15***

**Client:** Rule Engineering LLC

**Project:** Enterprise San Juan 32-8 Unit 264H BGT

| Sample ID **MB-18435** | SampType: **MBLK** | TestCode: **EPA Method 300.0: Anions** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **18435** | RunNo: **25209** |
| Prep Date: **3/31/2015** | Analysis Date: **3/31/2015** | SeqNo: **745174** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | ND | 1.5 | | | | | | | | |

| Sample ID **LCS-18435** | SampType: **LCS** | TestCode: **EPA Method 300.0: Anions** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **18435** | RunNo: **25209** |
| Prep Date: **3/31/2015** | Analysis Date: **3/31/2015** | SeqNo: **745175** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | 14 | 1.5 | 15.00 | 0 | 95.1 | 90 | 110 | | | |

**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 Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **1503C79**

***01-Apr-15***

**Client:** Rule Engineering LLC

**Project:** Enterprise San Juan 32-8 Unit 264H BGT

| Sample ID **MB-18381** | SampType: **MBLK** | TestCode: **EPA Method 418.1: TPH** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **18381** | RunNo: **25190** |
| Prep Date: **3/27/2015** | Analysis Date: **3/31/2015** | SeqNo: **744467** 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-18381** | SampType: **LCS** | TestCode: **EPA Method 418.1: TPH** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **18381** | RunNo: **25190** |
| Prep Date: **3/27/2015** | Analysis Date: **3/31/2015** | SeqNo: **744468** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Petroleum Hydrocarbons, TR | 91 | 20 | 100.0 | 0 | 90.9 | 86.7 | 126 | | | |

| Sample ID **LCSD-18381** | SampType: **LCSD** | TestCode: **EPA Method 418.1: TPH** |
|---|---|---|
| Client ID: **LCSS02** | Batch ID: **18381** | RunNo: **25190** |
| Prep Date: **3/27/2015** | Analysis Date: **3/31/2015** | SeqNo: **744469** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Petroleum Hydrocarbons, TR | 91 | 20 | 100.0 | 0 | 90.9 | 86.7 | 126 | 0 | 20 | |

**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 Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **1503C79**

***01-Apr-15***

**Client:** Rule Engineering LLC

**Project:** Enterprise San Juan 32-8 Unit 264H BGT

| Sample ID **MB-18375** | SampType: **MBLK** | TestCode: **EPA Method 8015D: Diesel Range Organics** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **18375** | RunNo: **25150** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743739** 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 | 10 | | 10.00 | | 104 | 63.5 | 128 | | | |

| Sample ID **LCS-18375** | SampType: **LCS** | TestCode: **EPA Method 8015D: Diesel Range Organics** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **18375** | RunNo: **25150** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743740** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Diesel Range Organics (DRO) | 49 | 10 | 50.00 | 0 | 98.3 | 67.8 | 130 | | | |
| Surr: DNOP | 5.3 | | 5.000 | | 105 | 63.5 | 128 | | | |

**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 Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **1503C79**

***01-Apr-15***

**Client:** Rule Engineering LLC

**Project:** Enterprise San Juan 32-8 Unit 264H BGT

| Sample ID **MB-18386** | SampType: **MBLK** | | | TestCode: **EPA Method 8015D: Gasoline Range** | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Client ID: **PBS** | Batch ID: **18386** | | | RunNo: **25161** | | | | | |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | | | SeqNo: **743685** | | 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 | 920 | | 1000 | | 91.5 | 80 | 120 | | | |

| Sample ID **LCS-18386** | SampType: **LCS** | | | TestCode: **EPA Method 8015D: Gasoline Range** | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Client ID: **LCSS** | Batch ID: **18386** | | | RunNo: **25161** | | | | | |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | | | SeqNo: **743686** | | Units: **mg/Kg** | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Gasoline Range Organics (GRO) | 25 | 5.0 | 25.00 | 0 | 98.7 | 64 | 130 | | | |
| Surr: BFB | 970 | | 1000 | | 97.3 | 80 | 120 | | | |

| Sample ID **1503C79-001AMS** | SampType: **MS** | | | TestCode: **EPA Method 8015D: Gasoline Range** | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Client ID: **SC-1** | Batch ID: **18386** | | | RunNo: **25161** | | | | | |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | | | SeqNo: **743696** | | Units: **mg/Kg** | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Gasoline Range Organics (GRO) | 24 | 4.8 | 24.02 | 0 | 98.3 | 47.9 | 144 | | | |
| Surr: BFB | 960 | | 960.6 | | 100 | 80 | 120 | | | |

| Sample ID **1503C79-001AMSD** | SampType: **MSD** | | | TestCode: **EPA Method 8015D: Gasoline Range** | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Client ID: **SC-1** | Batch ID: **18386** | | | RunNo: **25161** | | | | | |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | | | SeqNo: **743697** | | Units: **mg/Kg** | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Gasoline Range Organics (GRO) | 23 | 4.8 | 23.95 | 0 | 97.6 | 47.9 | 144 | 1.06 | 29.9 | |
| Surr: BFB | 950 | | 957.9 | | 99.3 | 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 Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **1503C79**

***01-Apr-15***

**Client:** Rule Engineering LLC

**Project:** Enterprise San Juan 32-8 Unit 264H BGT

| Sample ID **MB-18386** | SampType: **MBLK** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **18386** | RunNo: **25161** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743707** 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: 4-Bromofluorobenzene | 1.1 | | 1.000 | | 107 | 80 | 120 | | | |

| Sample ID **LCS-18386** | SampType: **LCS** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **18386** | RunNo: **25161** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743708** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | 1.2 | 0.050 | 1.000 | 0 | 119 | 76.6 | 128 | | | |
| Toluene | 1.1 | 0.050 | 1.000 | 0 | 111 | 75 | 124 | | | |
| Ethylbenzene | 1.1 | 0.050 | 1.000 | 0 | 113 | 79.5 | 126 | | | |
| Xylenes, Total | 3.4 | 0.10 | 3.000 | 0 | 113 | 78.8 | 124 | | | |
| Surr: 4-Bromofluorobenzene | 1.1 | | 1.000 | | 112 | 80 | 120 | | | |

| Sample ID **1503C79-001AMS** | SampType: **MS** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **SC-1** | Batch ID: **18386** | RunNo: **25161** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743724** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | 1.1 | 0.048 | 0.9606 | 0 | 111 | 69.2 | 126 | | | |
| Toluene | 0.99 | 0.048 | 0.9606 | 0 | 103 | 65.6 | 128 | | | |
| Ethylbenzene | 1.0 | 0.048 | 0.9606 | 0 | 104 | 65.5 | 138 | | | |
| Xylenes, Total | 3.0 | 0.096 | 2.882 | 0.02935 | 102 | 63 | 139 | | | |
| Surr: 4-Bromofluorobenzene | 1.1 | | 0.9606 | | 111 | 80 | 120 | | | |

| Sample ID **1503C79-001AMSD** | SampType: **MSD** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **SC-1** | Batch ID: **18386** | RunNo: **25161** |
| Prep Date: **3/27/2015** | Analysis Date: **3/30/2015** | SeqNo: **743725** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | 1.1 | 0.048 | 0.9579 | 0 | 110 | 69.2 | 126 | 1.21 | 18.5 | |
| Toluene | 1.0 | 0.048 | 0.9579 | 0 | 105 | 65.6 | 128 | 0.865 | 20.6 | |
| Ethylbenzene | 1.0 | 0.048 | 0.9579 | 0 | 104 | 65.5 | 138 | 0.0293 | 20.1 | |
| Xylenes, Total | 3.0 | 0.096 | 2.874 | 0.02935 | 103 | 63 | 139 | 0.348 | 21.1 | |
| Surr: 4-Bromofluorobenzene | 1.0 | | 0.9579 | | 108 | 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 Not In Range
- RL Reporting Detection Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

*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: **RULE ENGINEERING LL** Work Order Number: **1503C79** RcptNo: **1**

Received by/date: [signature] 03/27/15

Logged By: **Lindsay Mangin** **3/27/2015 7:30:00 AM** [signature]

Completed By: **Lindsay Mangin** **3/27/2015 9:09:15 AM** [signature]

Reviewed By: [signature] 03/27/15

## 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 | 2.3 | 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#: dwatson@ruleengineering.com

QA/QC Package:
[X] Standard [ ] Level 4 (Full Validation)

Accreditation
[ ] NELAP [ ] Other

[ ] EDD (Type)

Turn-Around Time:
[X] Standard [ ] Rush

Project Name:
Enterprise
San Juan 32-8 Unit 264H BGT

Project #:

Project Manager:
Deborah Watson

Sampler: D Watson
On Ice: [X] Yes [ ] No
Sample Temperature: 2.3


**HALL ENVIRONMENTAL ANALYSIS LABORATORY**
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107


Analysis Request

| Date | Time | Matrix | Sample Request ID | Container Type and # | Preservative Type | HEAL No. 1502779 | BTEX + ~~MTBE~~ + TPH (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 ($F^-$, $Cl^-$, $NO_3$, $NO_2$, $PO_4$, $SO_4$) | 8081 Pesticides / 8082 PCB's | 8260B (VOA) | 8270 (Semi-VOA) | | | | | Air Bubbles (Y or N) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 3-26-15 | 950 | Soil | SC-1 | 3-4oz glass | cold | -001 | X | | X | X | | | | X | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
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| Date: | Time: | Relinquished by: | Received by: | Date | Time |
|---|---|---|---|---|---|
| 3/26/15 | 1614 | Deborah Watson | Christine Walters | 3/26/15 | 1614 |
| 3/26/15 | 1720 | Christine Walters | | 03/27/15 | 0730 |

Remarks: Bill to Enterprise
Attention: Tom Long
WO: 1047895
Area: 100B
Paykey: RB21200

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.

Enterprise Products

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

OIL CONS. DIV DIST. 3

SEP 21 2015

September 16, 2015

7014 2120 0001 5337 0622
Return Receipt Requested

Mr. Cory Smith
New Mexico Energy Minerals & Natural Resources
Oil Conservation Division
Aztec District III Office
1000 Rio Brazos Road
Aztec, New Mexico 87401

RE: Below Grade Tank Closure Report
Enterprise Field Services LLC
San Juan 32-8 #264 Unit H
1000 Rio Brazos Road
Aztec, New Mexico 87401Unit Letter L Section 9 T32NR8W
San Juan County, New Mexico

Dear Mr. Smith:

Attached is a signed copy of the report as previously submitted on May 5 (letter attached). The signature in the report was missed. I apologize for any inconvenience.

Yours truly,

Shiver J. Nolan

Shiver J. Nolan
Sr. Compliance Administrator

/attachments

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.enterpriseproducts.com

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Enterprise Products

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC



May 5, 2015

7014 2120 0001 5336 0319
Return Receipt Requested

Mr. Cory Smith
New Mexico Energy, Minerals & Natural Resources
Department – Oil Conservation Division
Aztec District III Office
1000 Rio Brazos Road
Aztec, New Mexico 87401

**RE: Below Grad Tank Closure Report**
**Enterprise Field Services, LLC.**
**San Juan 32-8 #264 Unit H**
**Unit Letter L Section 9 T32N R8W**
**San Juan County, New Mexico**

Dear Mr. Smith:

Enterprise Field Services is submitting the attached closure report for the below grade tank (BGT) located at the San Juan 32-8 #264 Unit H well site. The compressor, BGT and ancillary equipment were removed from service.

If you have any questions or need additional information, please contact Thomas Long, our area environmental representative at 505-599-2286 or me directly 713-381-6684.

Yours truly,

Jon E. Fields
Director, Environmental.

/sjn
enclosure

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.enterpriseproducts.com