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

# OIL CONS. DIV DIST. 3

FEB 1 8 2016

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.

N/	Pit, Below-Grade Tank, or
Proposed Alternat	tive Method Permit or Closure Plan Application
□ Permit of a part of a p	e tank registration pit or proposed alternative method a pit, below-grade tank, or proposed alternative method on to an existing permit/or registration n only submitted for an existing permitted or non-permitted pit, below-grade tank,
lease be advised that approval of this request does not relie	plication (Form C-144) per individual pit, below-grade tank or alternative request eve the operator of liability should operations result in pollution of surface water, ground water or the responsibility to comply with any other applicable governmental authority's rules, regulations or ordinant
i. Operator: BP America Production Company	OGRID#: 778
	1 87401
	OCD Permit Number:
U/L or Qtr/Qtr I Section 33 T	Township 31N Range 10W County: San Juan
Center of Proposed Design: Latitude 36.85411	Longitude <u>-107.88100</u> NAD: □1927 ⊠ 1983
Surface Owner: 🛛 Federal 🗌 State 🗌 Private 🔲 Trib	bal Trust or Indian Allotment
2.	
Pit: Subsection F, G or J of 19.15.17.11 NMAC	
Temporary: Drilling Workover	
	☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
	mil LLDPE HDPE PVC Other
String-Reinforced	
Liner Seams: Welded Factory Other	Volume:bbl Dimensions: Lx Wx D
3.	
3.    Below-grade tank: Subsection I of 19.15.17.11 N	NMAC
Below-grade tank: Subsection I of 19.15.17.11 N	
☑ Below-grade tank:       Subsection I of 19.15.17.11 N         Volume:       95       bbl       Type of fluit	
☑ Below-grade tank:       Subsection I of 19.15.17.11 N         Volume:       95       bbl Type of flui         Tank Construction material:       Steel	
☑ Below-grade tank:       Subsection I of 19.15.17.11 N         Volume:       95       bbl Type of flui         Tank Construction material:       Steel         ☐ Secondary containment with leak detection       Vi	id: Produced water

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, and the strange of the permanent residence of	hospital,
institution or church)  Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
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	
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(x): Property must be submitted to the property division district for consideration of approach	
<ul> <li>□ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.</li> <li>□ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.</li> </ul>	
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 accept material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	otable source
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
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
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
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ 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	☐ Yes ☐ No					
application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image						
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No					
Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No					
Temporary Pit Non-low chloride drilling fluid						
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).						
- Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No					
<ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	☐ Yes ☐ No					
or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site  Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.						
	☐ Yes ☐ No					
Permanent Pit or Multi-Well Fluid Management Pit						
- Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No					
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image						
initial application.	☐ Yes ☐ No					
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No					
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 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. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number:  or Permit Number:	O NMAC					
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC	产品证 各					
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 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 or	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	
<ul> <li>Nuisance or Hazardous Odors, including H₂S, Prevention Plan</li> <li>Emergency Response Plan</li> </ul>	
☐ 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 F	luid Management Pit
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	and the death
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.	P .
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 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	Yes No
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	Yes No
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	Yes No
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	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 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	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland.	
US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	
	☐ Yes ☐ No
Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area.  - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	
Within a 100-year floodplain FEMA map	Yes No
- ГЕМА шар	
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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.  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - 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 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	11 NMAC 15.17.11 NMAC
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 beli	ief.
Name (Print): Title:	
Signature:	11.70
e-mail address: Telephone:	
e-mail address:	Kada I
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 19.	Kada I
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 2118  Title Winnertal Decalist OCD Permit Number:	3 12016  g the closure report.
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not	3 12016  g the closure report.
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature:  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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	g the closure report.

	tted with this closure report is true, accurate and complete to the best of my knowledge and cable closure requirements and conditions specified in the approved closure plan.
Name (Print): Steve Moskal	Title: Field Environmental Coordinator
Signature: Hawking	Date: February 17, 2015
e-mail address: steven.moskal@bp.com	Telephone: (505) 326-9497

# BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### BELOW-GRADE TANK CLOSURE PLAN

#### Atlantic B LS 1B API No. 3004529970 Unit Letter I, Section 33, T31N, R10W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

#### General Closure Plan

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
  - BP did not anticipate closure at this time. Closure of the BGT stemmed from the cost remediation activities on the site that determined the location would not receive a new BGT meeting the pit rule requirements. The location will be reconfigured to have no surface equipment.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
  - BP did not anticipate closure at this time. Closure of the BGT stemmed from the cost remediation activities on the site that determined the location would not receive a new BGT meeting the pit rule requirements. The location will be reconfigured to have no surface equipment.
- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:

- a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
- b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
- c. Basin Disposal, Permit NM-01-0005 (Liquids)
- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

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

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

The BGT was transported to a storage area for recycling.

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method  95 bbl BGT	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	< 0.042
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.083
TPH	US EPA Method SW-846 418.1 or 8015 extended	100	<9.7
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<30

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

Soil under the BGT was sampled for TPH (GRO/DRO), BTEX and chloride. Chloride, BTEX and TPH

concentrations were below the stated limits. MRO was inadvertently not run due to following the spill and release guidelines. BP strongly believes there was no impacts in the area of the BGT based on an extensive remediation investigation and excavation. The laboratory report is attached.

- 7. BP shall notify the division District III office of its results on form C-141. C-141 is attached.
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

  Sampling results indicate no significant release has occurred.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

Sample results demonstrate no release had occurred. The location has been backfilled and will be seeded during final reclamation activities.

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

The area will be reclaimed when the well has been plugged and abandoned.

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

The area will be reclaimed when the well has been plugged and abandoned.

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

The area will be reclaimed when the well has been plugged and abandoned. Seeding will be completed and the area will be monitored until full reclamation is achieved.

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

The area will be reclaimed when the well has been plugged and abandoned. Seeding has been completed and the area will be monitored until full reclamation is achieved.

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

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.
     Closure report on C-144 form is included including photos of reclamation completion.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

<u>District I</u> 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

Form C-141 Revised August 8, 2011

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

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

STATE OF		4	Rele	ease Notific	cation	and Co	rrective A	ction						
						OPERA'	ГOR	☐ Ini	tial Report   Final Report					
Name of Co	ompany: B	P				Contact: Ste	eve Moskal							
Address: 20	00 Energy (	Court, Farmi	ngton, N	M 87401		Telephone No.: 505-326-9497								
Facility Name: Atlantic B LS 1B						Facility Typ	e: Natural gas v	well						
Surface Ow	ner: Feder	al		Mineral (	Owner:	Federal		APIN	lo. 3004529970					
				LOCA	ATIO	N OF RE	LEASE							
Unit Letter I							Feet from the 660	County: San Juan						
		Lati	tude36	5.85411		Longitude	-107.88100	THE RELLEGIO						
				NAT	TURE	OF REL	EASE							
Type of Rele		VETTE N		0.179		Volume of	Release: unknow		Recovered: N/A					
Source of Re	elease: belov	w grade tank –	- 95 bbl			Date and I unknown	Hour of Occurrence	Date an	d Hour of Discovery: none					
Was Immedi	ate Notice (		Yes 🗵	No □ Not R	equired	If YES, To	Whom?							
By Whom?	NA P.					Date and I	Hour							
Was a Water	course Read	ched?	Yes 🗵	No		If YES, V	olume Impacting	the Watercourse.						
Describe Ca	use of Probl	em and Reme H below stand	dial Actio		ing of th	e soil beneath	the BGT was do	ne during remove	al. Soil analysis resulted for					
abandoned.									ion after the well is plugged and					
regulations a public health should their or the enviro	all operators or the envi operations honment. In a	are required to ronment. The nave failed to	to report and acceptant adequately OCD accept	nd/or file certain ce of a C-141 rep investigate and	release r ort by th remediat	notifications a se NMOCD m te contaminat	nd perform correct parked as "Final Ricon that pose a thr	ctive actions for a deport" does not a reat to ground wa	resuant to NMOCD rules and eleases which may endanger elieve the operator of liability ter, surface water, human health compliance with any other					
Signature:	Olo	Wind					OIL CON	SERVATIO	N DIVISION					
Printed Nam	e: Steve Mo	oskal				Approved by	Environmental S	Specialist:						
Title: Field	Environmen	tal Coordinate	or	14 70 0 45		Approval Da	te:	Expiration	n Date:					
E-mail Addı	ress: steven.	moskal@bp.c	om			Conditions o	f Approval:		Attached					

Phone: 505-326-9497

Date: February 17, 2016 \* Attach Additional Sheets If Necessary

BEI1005E-6.SKF

revised: 11/26/13



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

January 11, 2016

Jeff Blagg Blagg Engineering P. O. Box 87 Bloomfield, NM 87413 TEL: (505) 320-1183

FAX

RE: Atlantic B LS 1B

OrderNo.: 1601163

#### Dear Jeff Blagg:

Hall Environmental Analysis Laboratory received 5 sample(s) on 1/7/2016 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 <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> 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

andyl

4901 Hawkins NE

Albuquerque, NM 87109

#### **Analytical Report**

#### Lab Order 1601163

Date Reported: 1/11/2016

#### Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering Client Sample ID: TH-4 @ 10'

 Project:
 Atlantic B LS 1B
 Collection Date: 1/6/2016 10:58:00 AM

 Lab ID:
 1601163-002
 Matrix: MEOH (SOIL)
 Received Date: 1/7/2016 8:15:00 AM

Analyses Result RL Qual Units DF Date Analyzed Batch **EPA METHOD 300.0: ANIONS** Analyst: LGT 1/7/2016 12:26:20 PM 23106 Chloride ND 30 mg/Kg **EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: KJH 1/7/2016 11:52:46 AM 23102 Diesel Range Organics (DRO) ND 9.7 mg/Kg Surr: DNOP 126 70-130 %REC 1/7/2016 11:52:46 AM 23102 **EPA METHOD 8015D: GASOLINE RANGE** Analyst: NSB Gasoline Range Organics (GRO) ND 4.2 mg/Kg 1/7/2016 11:32:42 AM A31307 Surr: BFB 89.3 %REC 1/7/2016 11:32:42 AM A31307 66.2-112 1 **EPA METHOD 8021B: VOLATILES** Analyst: NSB Benzene ND 0.042 mg/Kg 1/7/2016 11:32:42 AM R31307 1 Toluene ND 0.042 mg/Kg 1/7/2016 11:32:42 AM R31307 Ethylbenzene ND 0.042 mg/Kg 1/7/2016 11:32:42 AM R31307 Xylenes, Total ND 0.083 mg/Kg 1 1/7/2016 11:32:42 AM R31307 %REC 1/7/2016 11:32:42 AM R31307 Surr: 4-Bromofluorobenzene 122 80-120

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

#### 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 Page 2 of 9
- P Sample pH Not In Range
- RL Reporting Detection Limit

# Hall Environmental Analysis Laboratory, Inc.

WO#: 1601163

11-Jan-16

Client:

Blagg Engineering

Project:

Atlantic B LS 1B

Sample ID MB-23106

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 23106

RunNo: 31326

Prep Date: 1/7/2016

Analysis Date: 1/7/2016

SeqNo: 959120

Units: mg/Kg

Qual

Analyte Chloride

Result

SPK value SPK Ref Val %REC LowLimit

HighLimit

**RPDLimit** %RPD

PQL ND

1.5

TestCode: EPA Method 300.0: Anions

Sample ID LCS-23106

Client ID: LCSS

SampType: LCS Batch ID: 23106

RunNo: 31326 SeqNo: 959121

Units: mg/Kg

HighLimit

Analyte

Prep Date: 1/7/2016

Analysis Date: 1/7/2016

SPK value SPK Ref Val %REC

15.00

92.5

%RPD

**RPDLimit** 

Qual

Chloride

PQL 1.5

110

14

Qualifiers:

S

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Holding times for preparation or analysis exceeded H

% Recovery outside of range due to dilution or matrix

Not Detected at the Reporting Limit ND

RPD outside accepted recovery limits R

Analyte detected in the associated Method Blank

E

Analyte detected below quantitation limits

Sample pH Not In Range

Reporting Detection Limit

Value above quantitation range

Page 6 of 9

# Hall Environmental Analysis Laboratory, Inc.

WO#: 1601163

11-Jan-16

Client:

Blagg Engineering

Atlantic B LS 1B

Sample ID MB-23102	SampType: MBLK	TestCode: EPA Method	8015M/D: Diesel Range	e Organics	
Client ID: PBS	Batch ID: 23102	Batch ID: 23102 RunNo: 31293			
Prep Date: 1/7/2016	Analysis Date: 1/7/2016	SeqNo: 958006	Units: mg/Kg		
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual	
Diesel Range Organics (DRO) Surr: DNOP	ND 10 8.0 10.00	79.7 70	130		
Sample ID MB-23116	SampType: MBLK	TestCode: EPA Method	8015M/D: Diesel Range	e Organics	
Client ID: PBS	Batch ID: 23116	RunNo: 31303			
Prep Date: 1/7/2016	Analysis Date: 1/7/2016	SeqNo: 958503	Units: %REC		
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual	
Surr: DNOP	14 10.00	137 70	130	S	
Sample ID LCS-23102	SampType: LCS	TestCode: EPA Method	8015M/D: Diesel Range	e Organics	
Client ID: LCSS	Batch ID: 23102	RunNo: 31293			
Prep Date: 1/7/2016	Analysis Date: 1/7/2016	SeqNo: 958703	Units: mg/Kg		
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual	
Diesel Range Organics (DRO)	45 10 50.00	0 90.0 65.8	136		
Surr: DNOP	4.2 5.000	83.8 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

Page 7 of 9

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1601163

11-Jan-16

Client:

Blagg Engineering

Project:

Atlantic B LS 1B

Sample ID 5ML RB

SampType: MBLK

TestCode: EPA Method 8015D: Gasoline Range

66.2

Client ID:

**PBS** 

Batch ID: A31307

5.0

RunNo: 31307

Prep Date:

Analysis Date: 1/7/2016

Units: mg/Kg

Analyte

Result PQL SPK value SPK Ref Val

SeqNo: 958472

Gasoline Range Organics (GRO)

ND

%REC LowLimit HighLimit

890

1000

88.5

112

**RPDLimit** 

Qual

Surr: BFB

Sample ID 2.5UG GRO LCS

SampType: LCS

TestCode: EPA Method 8015D: Gasoline Range

%RPD

Client ID: LCSS

Batch ID: A31307

Analysis Date: 1/7/2016

RunNo: 31307 SeqNo: 958473

Units: mg/Kg

Analyte Gasoline Range Organics (GRO) Result PQL

SPK value SPK Ref Val

%REC 0

LowLimit 79.6

HighLimit 122 %RPD **RPDLimit**  Qual

Surr: BFB

Prep Date:

22 990

25.00 1000

99.0

66.2

5.0

88.88

112

#### Qualifiers:

S

Value exceeds Maximum Contaminant Level.

Sample Diluted Due to Matrix D

H Holding times for preparation or analysis exceeded

% Recovery outside of range due to dilution or matrix

Not Detected at the Reporting Limit ND

RPD outside accepted recovery limits R

Analyte detected in the associated Method Blank

Value above quantitation range E

J Analyte detected below quantitation limits

P Sample pH Not In Range

Reporting Detection Limit

Page 8 of 9

# Hall Environmental Analysis Laboratory, Inc.

WO#: 1601163

11-Jan-16

Qual

Client: Project: Blagg Engineering

Sample ID 5ML RB

Atlantic B LS 1B

Client ID: PBS

Prep Date:

SampType: MBLK

TestCode: EPA Method 8021B: Volatiles

Batch ID: R31307

RunNo: 31307

Analysis Date: 1/7/2016

SeqNo: 958479

Units: mg/Kg

HighLimit

%RPD

**RPDLimit** 

Analyte Result PQL Benzene ND 0.050 ND 0.050 Toluene ND 0.050 Ethylbenzene

Xylenes, Total ND Surr: 4-Bromofluorobenzene 1.2

1.000

SPK value SPK Ref Val %REC LowLimit

120 119

TestCode: EPA Method 8021B: Volatiles

Sample ID 100NG BTEX LCS Client ID: LCSS

SampType: LCS Batch ID: R31307

0.10

RunNo: 31307

Prep Date:	Analysis I	Analysis Date: 1/7/2016			SeqNo: 9	58480	Units: mg/F	(g			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	0.92	0.050	1.000	0	91.9	80	120				
Toluene	0.94	0.050	1.000	0	94.2	80	120				
Ethylbenzene	0.97	0.050	1.000	0	96.8	80	120				
Xylenes, Total	3.0	0.10	3.000	0	100	80	120				
Surr: 4-Bromofluorobenzene	1.3		1.000		129	80	120			S	

#### Qualifiers:

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

Page 9 of 9



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

Received by/date:  Lindsay Mangin  1/7/2016 8:15:00 AM  Completed By: Lindsay Mangin  Reviewed By:  Chain of Custody  1. Custody seals intact on sample bottles?  2. Is Chain of Custody complete?  3. How was the sample delivered?  Log In  4. Was an attempt made to cool the samples?	Yes ☐ Yes ☑ Courier	O S	-	Not Present ☑	
Completed By: Lindsay Mangin  Reviewed By:  Chain of Custody  1. Custody seals intact on sample bottles?  2. Is Chain of Custody complete?  3. How was the sample delivered?	Yes 🗸	1.04		Not Present ☑	
Reviewed By:  Chain of Custody  1. Custody seals intact on sample bottles?  2. Is Chain of Custody complete?  3. How was the sample delivered?	Yes 🗸	1.04		Not Present ☑	
Reviewed By:  Chain of Custody  1. Custody seals intact on sample bottles?  2. Is Chain of Custody complete?  3. How was the sample delivered?	Yes 🗸	1.04		Not Present ☑	
1. Custody seals intact on sample bottles? 2. Is Chain of Custody complete? 3. How was the sample delivered?	Yes 🗸	1.04		Not Present ☑	
1. Custody seals intact on sample bottles? 2. Is Chain of Custody complete? 3. How was the sample delivered?  Log In	Yes 🗸	1.04		Not Present	
2. Is Chain of Custody complete? 3. How was the sample delivered?	Yes 🗸	1.04	-	Section of the sectio	
3. How was the sample delivered?				Not Present	
og In	Decision Line				
4 Was an attempt made to cool the samples?				and the same	
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 🗆	
Sample(s) in proper container(s)?	Yes 🗹	No			
7. Sufficient sample volume for indicated test(s)?	Yes V	No			
8, Are samples (except VOA and ONG) properly preserved?	Yes V	No			
9, Was preservative added to bottles?	Yes 🗌	No	V	NA 🗆	
	Yes 🗆	No		No VOA Vials	
0. VOA vials have zero headspace?	Yes -		V	NO YON VIAIS ISS	
1. Were any sample containers received broken?	res —	.,,,		# of preserved bottles checked	
12. Does paperwork match bottle labels?	Yes 🗹	No		for pH:	
(Note discrepancies on chain of custody)	term and	307		(<2 o	or >12 unless noted)
3. Are matrices correctly identified on Chain of Custody?	Yes V			Adjusted	
4. Is it clear what analyses were requested?	Yes W	No No		Checked by:	
<ol> <li>Were all holding times able to be met?</li> <li>(If no, notify customer for authorization.)</li> </ol>	Yes 🗹	NO	ш	Olivered by	
pecial Handling (if applicable)					
6. Was client notified of all discrepancies with this order?	Yes 🗌	No		NA 🗹	
Person Notified: Date			_	11 11 11 11 11	
By Whom: Via:	eMail	Phone	Fax	In Person	
Regarding:	L. Sariani		100		1 7 7 1
Client Instructions:					4 -
17. Additional remarks:					-

C	hain	-of-Cu	ustody Record	Turn-Around	Time:	New 2 Day	1						_			-					
lient:	BP.	Amen	ngin early	□ Standard	* KRush	(Friday 1/3)													NT	AL	,
	BLA	66 t	noineanh	Project Name	<b>)</b> :						ww	v.hal	llenv	riron	men	tal.co	om				
lailing	Address		9 0	ATLA	MIC B	LS 1B		49	01 H	awki	ins N	VE -	Alt	nan	erau	e. N	M 87	109			
				Project #:						5-34					505-						
hone :	#: 50	5-32	20-1193		P. S. Mary				uit I			A	nal	ysis	Req	ues					
mail o	r Fax#:	Marie M		Project Mana	iger:		-	(YIC	æ					(7)							
A/QC Package:  ★Standard □ Level 4 (Full Validation)			J.	BLAGO		-TMES (8021)	(Gas only)	DRO / MRR			SIMS)		PO4,SC	PCB's							
ccredi	itation			Sampler:	T. BLAG	76	曾	TPH	/ DF	=	7	202		102	082						=
I NEL	AP	□ Othe	er	On loe:		□ No	1 #	+	30	418.1)	04.	8270		03,1	8/8		F				0 70
EDD	(Type)_			Sample Tem	perature: 1	8		BE	(G	4 bo	od 5	0 0	tals	Ž,	ides	8	9	tal	1		3
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX + MES	BTEX + MTBE	TPH 8015B (GRO	TPH (Method	EDB (Method 504.1)	PAH's (8310 or	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,SO4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	CHLOSCIDE			Air Bubbles (Y or N)
Koil	0948	SOIL	TH-1@15	402×1	COOL	-001	X		X				-		- W	w	w	X			1
11	1058	Lí	TH-4@10'	u	· · · · · ·	-00Z	X		X									X			
l1	1130	и	TH-5@ 20'	V	11	-003	X		X									×			
Li	1259	M	TH-7@ 15'	11	11	-004	X		X	7								X	_	1	1
11	1322	И	TH-8015'	k	l l	-005	У		×									×			
								+_													
																			-		
						Market Service													+		-
12016	Time: 1437	Relinguish	1 Blogy	Received by:	Week	Vo/2016 1437	Rer	nark	s: E	NOR	KO	ZDEI						399			1
ate:	Time: \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\	Relinduish	intend to Hall Environmental may be sub-	Received by:	Ol conedited laboratoris	Date Time  OTIVE 0815  es. This serves as notice of thi					ut	act d data	2	Sti	EVE	1	los	KAL			



