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 Oll CONS DIV DIST 3
Type of action 🔀 Below grade tank registration
Permit of a pit or proposed alternative method  Closure of a pit below grade tank or proposed alternative method  JAN 1 2 2017
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
Operator ConocoPhillips Company OGRID # 217817
Address PO Box 4289, Farmington, New Mexico 87499
Facility or well name SAN JUAN 29 6 UNIT 22A
API Number 30 039 21425 OCD Permit Number
U/L or Qtr/Qtr O Section 12 Township 29N Range 6W County Rio Arriba
Center of Proposed Design Latitude 36 735234 N Longitude 107 411346 W NAD 1927 1983
Surface Owner    Federal    State    Private    Tribal Trust or Indian Allotment
2
Pit Subsection F G or J of 19 15 17 11 NMAC
Temporary Drilling Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&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
Below grade took Subsection Left 10.15.17.11.NBAAC
Below grade tank Subsection I of 19 15 17 11 NMAC
Volume Max 120 bbl Type of fluid Produced Water
Tank Construction material Metal
Secondary containment with leak detection Visible sidewalls liner 6 inch lift and automatic overflow shut off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other
Liner type Thickness45mil
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
The same state and the state of

Alternate Please specify 4 hog wire fence with a single strand of barbed wire on top

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)	
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  Variances and Exc	
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 accematerial are provided below Siting criteria does not apply to drying pads or above grade tanks	ptable 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 idopted pursuant to NMSA 1978 Section 3 27 3 as amended ( <b>Does not apply to below grade tanks</b> )  Written confirmation or verification from the municipality Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine (Does not apply to below grade tanks)  Written confirmation or verification or map from the NM EMNRD Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area (Does not apply to below grade tanks)  Engineering measures incorporated into the design NM Bureau of Geology & Mineral Resources USGS NM Geological Society Topographic map	☐ Yes ☐ No
Within a 100 year floodplain (Does not apply to below grade tanks) FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse significant watercourse lake bed sinkhole wetland or playa lake (measured from the ordinary high water mark)  Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☑ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption  NM Office of the State Engineer  iWATERS database search Visual inspection (certification) of the proposed site	☐ Yes ☑ No
Femporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15 000 mg/liter)	
Within 100 feet of a continuously flowing watercourse or any other significant watercourse or within 200 feet of any lakebed sinkhole or playa lake (measured from the ordinary high water mark) (Applies to low chloride temporary pits)  Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence school hospital institution or church in existence at the time of initial application.	☐ Yes ☐ No
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 vatering purposes or 300feet of any other fresh water well or spring in existence at the time of the initial application NM Office of the State Engineer iWATERS database search Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland US Fish and Wildlife Wetland Identification map Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse or any other significant watercourse or within 200 feet of any lakebed sinkhole or playa lake (measured from the ordinary high water mark)  Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence school hospital institution or church in existence at the time of initial application Visual inspection (certification) of the proposed site. Aerial photo. Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes or 1000 feet of any other fresh water well or spring in the existence at the time of the initial application NM Office of the State Engineer IWATERS database search Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse or 200 feet of any other significant watercourse or lakebed sinkhole or playa lake (measured from the ordinary high water mark)  Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence school hospital institution or church in existence at the time of initial application Visual inspection (certification) of the proposed site. Aerial photo. Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes in existence at the time of initial application  NM Office of the State Engineer iWATERS database search. Visual inspection (certification) of the proposed site.	☐ Yes ☐ No
Within 500 feet of a wetland US Fish and Wildlife Wetland Identification map Topographic map Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below grade Tanks Permit Application Attachment Checklist  Subsection B of 19 15 17 9 N  Instructions Each of the following items must be attached to the application. Please indicate by a check mark in the box, that the docattached.  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 and 19 15 17 13 NMAC  Previously Approved Design (attach copy of design) API Number or Permit Number or Permit Number	NMAC 15 17 9 NMAC
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 docattached.  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	15 17 9 NMAC

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.	uocumenis are
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 H<sub>2</sub>S 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	
Closure Fiam based upon the appropriate requirements of Subsection C of 19 13 17 9 NIVIAC and 19 13 17 13 NIVIAC	
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 Fl☐ Alternative	uid 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 a	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	
Site Rectalization Figure Dased upon the appropriate requirements of Subsection Figure 13 17 13 NWIAC	
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 sour	ca matarial ara
provided below Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency P.	
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 1WATERS database search USGS Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25 50 feet below the bottom of the buried waste  NM Office of the State Engineer a WATERS database search USGS Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
·	
Ground water is more than 100 feet below the bottom of the buried waste  NM Office of the State Engineer 1WATERS database search USGS Data obtained from nearby wells	☐ Yes ☐ No ☐ 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)	Yes No
Topographic map Visual inspection (certification) of the proposed site	
	□ v□ v-
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	☐ Yes ☐ No
NM Office of the State Engineer IWATERS database Visual inspection (certification) of the proposed site	
Written confirmation or verification from the municipality Written approval obtained from the municipality	☐ Yes ☐ No
	☐ 1 €2 ☐ 140
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map Topographic map Visual inspection (certification) of the proposed site	
22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant in NMSA 1978 Section 3 27 3 as amended Written confirmation or verification from the numeripality Written approval obtained from the municipality Written approval obtained from the MEMNRD Mining and Mineral Division  Within an unstable used in the propagation of the design NM Bureau of Geology & Mineral Resources USGS NM Geological Benjameters in the propagation of the design NM Bureau of Geology & Mineral Resources USGS NM Geological Security Population in the Population of the Memory of the Population of the Mineral Resources USGS NM Geological Propagation in the Population of the Mineral Resources USGS NM Geological Propagation of the Population of the Mineral Resources USGS NM Geological Propagation of the Population of the Population of the Mineral Resources USGS NM Geological Propagation of the Population of the Mineral Resources USGS NM Geological Propagation of the Propagation of Schoetchon K of 19 15 17 13 NMAC Constitution of Samplage Plan International Plan based upon the appropriate requirements of 19 15 17 13 NMAC Disposal Propagation of the Samplage Plan (International Number (Principal Conference of the Propagation of the Samplage Plan (International Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC Disposal Plan Based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC Samplage Plan Disposal		
Written an unstable area Engineering neasures incorporated into the design NM Bureau of Goology & Mineral Resources USGS NM Geological Society Topographic map  Written 100 year floodplain  FEMA map  Written 100 year floodplain  FEMA map  A check mark in the hox, that the documents are attacked  Sting Circina Compliance Demonstrations based upon the appropriate requirements of 19 15 17 10 NMAC  Construction/Design Plan of Famula Three hid (pagin-leable) based upon the appropriate requirements of 19 15 17 13 NMAC  Construction/Design Plan of Famula Three hid (pagin-leable) based upon the appropriate requirements of Subsection B of 19 15 17 13 NMAC  Construction/Design Plan of Temporary Pri (for in place burnal of a dryrag pad) based upon the appropriate requirements of 19 15 17 13 NMAC  Construction/Design Plan of Temporary Pri (for in place burnal of a dryrag pad) based upon the appropriate requirements of 19 15 17 13 NMAC  Protocols and Procodures based upon the appropriate requirements of 19 15 17 13 NMAC  Waster Material Sampling Plan to the appropriate requirements of 19 15 17 13 NMAC  Disposal Pacifity Name and Permit Number (for liquids drilling fluids and drill extings or in case on site closure standards cannot be achieved)  Soil Course Design based upon the appropriate requirements of 19 15 17 13 NMAC  Soil Course Design based upon the appropriate requirements of 19 15 17 13 NMAC  Soil Course Design based upon the appropriate requirements of 19 15 17 13 NMAC  Disposal Pacifity Name and Permit Number (for liquids drilling fluids and drill extings or in case on site closure standards cannot be achieved)  Soil Course Design based upon the appropriate requirements of Subsection 11 of 19 15 17 3 NMAC  Disposal Pacifity Name and Permit Number (For liquids drilling fluids and drill extings or in case on site closure standards cannot be achieved)  The Course of the Course of the Subsection 10 of 19 15 17 13 NMAC  Disposal Pacifity Name and Permit Number (Por liquids drilling fluids and drill extings or in case		☐ Yes ☐ No
Fagnecing measures incorporated into the design NM Bureau of Geology & Mineral Resources: USGS NM Geological Society Topographic map  Within a 100 year floodplain  Field Amp  Within a 100 year floodplain  Field Amp  No  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.  Sting Critical Compliance Demonstrations based upon the appropriate requirements of 19 15 17 10 NMAC  Construction/Design Plan of Burnal Trench (if applicable) based upon the appropriate requirements of Subsection 8 of 19 15 17 13 NMAC  Construction/Design Plan of Burnal Trench (if applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Construction/Design Plan of Burnal Trench (if applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Waste Maries Amplian based upon the appropriate requirements of 19 15 17 13 NMAC  Society Plan of Burnal Trench (if applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Society Plan of Subsection of 19 15 17 13 NMAC  Society Plan (applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Society Plan (applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Society Plan (applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  The Reclamation Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Society Plan (applicable) based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  The Reclamation Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  The Reclamation Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Details of the Application Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  The Reclamation Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Details of the Application Plan based upon the		☐ Yes ☐ No
Within a 100 year floodplain    Ves   No	Engineering measures incorporated into the design NM Bureau of Geology & Mineral Resources USGS NM Geological	
On Site Closure Plan Checklet (19 15 17 13 NMAC) Instructions	Within a 100 year floodplain	
On the Closure Plan Checkint (19 15 17 13 MAC) Instructions Each of the following terms must be attacked to the closure plan Please indicate by a check must in the box, that the documents are attacked.  String Criteria Compliance Demonstrations based upon the appropriate requirements of 19 15 17 13 MAC  Crostruction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection & of 19 15 17 11 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection & of 19 15 17 11 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19 15 17 13 NMAC  Construction/Design Plan of Employers (if applicable) and the appropriate requirements of 19 15 17 13 NMAC  Disposal Pacility Name and Permi Number (for Inquids defining fluids and drill cuttings or in case on site closure standards cannot be achieved)  Solid Cover Design 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  Site Reclamation Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  The construction Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Department Application Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  The Report of Application Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Department Application Plan based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC  Department Application Subsection Plan Department Plan Plan Plan Plan Plan Plan Plan Plan	FEMA map	∐ Yes ∐ No
Operator Application Certification	On Site Closure Plan Checklist  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  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 cannel.  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
Name (Print)	<del></del>	
Signature	I hereby certify that the information submitted with this application is true accurate and complete to the best of my knowledge and beli	ef
e mail address		
OCD Approval Permit Application including closure plan)   Closure Plan (only)   OCD Conditions (see attachment)  OCD Representative Signature	Signature Date 1111/3017	
OCD Representative Signature    Approval Date   Approval Date	e mail address	
Closure Report (required within 60 days of closure completion)  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 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  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)	OCD Representative Signature Approval Date	9/17
Closure Report (required within 60 days of closure completion)  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 Method  Waste Excavation and Removal  On Site Closure Method  Alternative Closure Method  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)		
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  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)		
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  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)	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.	
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)	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.  Closure Completion Date	
On site Closure Location Latitude Longitude NAD 1927 1983	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.  Closure Completion Date  Closure Method  Waste Excavation and Removal On Site Closure Method Alternative Closure Method Waste Removal (Closed logical days)	complete this

Operator Closure Certification	
I hereby certify that the information and attachments submitted with this closure report belief. I also certify that the closure complies with all applicable closure requirements	t is true accurate and complete to the best of my knowledge and and conditions specified in the approved closure plan
Name (Print)	Title
Signature	Date
e mail address	Telephone

ConocoPhillips Company requests a variance for the items listed below. The requested variance per 19 15 17 15 A provides equal or better protection of fresh water public health & the environment

#### 1 Fencing

Fencing as described in Section 5 under Alternate COPC will construct all new fences around
the below grade tank utilizing 48 steel mesh field fence (hog wire) on the bottom with a
single strand of barbed wire on top T posts shall be installed every 12 feet and corners shall
be anchored utilizing a secondary T post Below grade tanks will be fenced regardless of
location

#### 2 Geo membrane Liner

- The geo membrane liner consists of a 45 mil flexible LLDPE material manufactured by
  Brawler Industries LLC as SuperScrim H45 SuperScrim H45 is manufactured with LLDPE and
  is 45 mil inch thickness and is reinforced with polyester scrim. The geomembrane liner has a
  hydraulic conductivity of less than 5 X 10 <sup>14</sup> cm/s and is resistant to ultraviolet light
  petroleum hydrocarbons salts and acidic and alkaline solutions. The manufacturer specific
  sheet is attached.
- 3 COPC will notify Public Entity Surface Owners by email in lieu of certified mail Private Entity Surface Owners will still be notified via certified mail



## New Mexico Office of the State Engineer

# Water Column/Average Depth to Water

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right file) (R=POD has been replaced O=orphaned, C=the file is

closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

		POD												
		Sub-		Q	Q	Q								Water
POD Number	Code	basın	County	64	16	4	Sec	Tws	Rng	X	Y	7	DepthWellDepthWat	er Column
SJ 00038			RA	3	4	4	06	29N	06W	276923	4069867		813	
SJ 00059			RA	2	2	2	35	29N	06W	283371	4063065		365 1	20 245
SJ 00059 S			RA	2	2	2	35	29N	06W	283371	4063065		335 1	20 215
SJ 00059 S 2			RA	4	4	4	26	29N	06W	283381	4063267		565 2	75 290
SJ 00059 S 3			RA	3	2	2	35	29N	06W	283171	4062865		561 1	46 415
<u>SJ 02794</u>			RA	2	2	2	12	29N	06W				280 1	40 140
<u>SJ 03364</u>			RA	1	4	3	13	29N	06W	284070	4066662		900 6	20 280
<u>SJ 03392</u>			RA	4	4	3	20	29N	06W	277798	4065022		210	
<u>SJ 03393</u>			RA	2	4	4	30	29N	06W	276951	4063634	æ	210	
<u>SJ 03406</u>			RA	4	3	3	05	29N	06W	277525	4069858	P	900 3	80 520
<u>SJ 03481</u>			RA	4	4	3	20	29N	06W	277798	4065022	92 ,	250	
<u>SJ 04014 POD1</u>			RA	3	4	3	12	29N	06W	283530	4060940	2	378	
SJ 04119 POD1			SJ	2	1	4	18	29N	06W	276660	4067201		480 3	40 140

Average Depth to Water 267 feet

Minimum Depth 120 feet

Maximum Depth 620 feet

Record Count 13

PLSS Search

Township 29N Range 06W

UTM l t was d rn ed from PLSS ee Help

The data is furnished by the NMOSE/ISC and accept d by the pent with the expressed understanding that the OSE/ISC make accuracy ompleted it ess, reliability usability or suitability for any particular purpose of the data.

warranti s expressed or impl ed, concerning th

WATER COLUMN/ AVERAGE DEPTH TO WATER

1/9/17 3 59 PM



## New Mexico Office of the State Engineer

# Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file ) (R=POD has been replaced O=orphaned, C=the file is

closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

	,		\ I							`			,	,	
		POD													
		Sub-	_	-	Q	_					`				Water
POD Number	Code	basın	County	64					-	X	Y		DepthWellDepth\		
SJ 00039			RA		2	3	29	29N	07W	268022	4064208		585	435	150
<u>SJ 00053</u>			RA			3	13	29N	07W	274326	4067036		536	460	76
SJ 00541			RA	4	4	1	06	29N	07W	266691	4070968	8	360	360	0
<u>SJ 00580</u>			RA		3	2	05	29N	07W	268604	4071023			160	
SJ 00807			SJ		4	2	06	29N	07W	267398	4071055		290	255	35
<u>SJ 01112</u>			RA	4	4	2	28	29N	07W	270543	4064431	<b>@</b>	2453	900	1553
<u>SJ 01199</u>			RA	4	2	3	09	29N	07W	269856	4068874		265	125	140
<u>SJ 01228</u>			RA		1	2	23	29N	07W	273312	4066455		285	205	80
SJ 02636			RA	2	1	3	05	29N	07W	267888	4070745		300	200	100
SJ 02891			RA	2	3	2	24	29N	07W	275007	4066104		210	160	50
<u>SJ 03390</u>			RA	4	2	1	13	29N	07W	274658	4067927		320	120	200
<u>SJ 03391</u>			RA	2	3	2	24	29N	07W	275007	4066104		210		
<u>SJ 03453</u>			RA	4	1	4	05	29N	07W	268692	4070519		355	20	335
<u>SJ 03573</u>			RA	1	4	2	24	29N	07W	275209	4066091		900		
SJ 03809 POD1			RA	3	2	2	24	29N	07W	275294	4066294		500	260	240
SJ 03981 POD1			RA	2	3	4	10	29N	07W	271851	4068541		500	250	250
SJ 04021 POD1			RA	2	2	1	09	29N	07W	269882	4069806	0	245	75	170
											Average De	pth t	o Water	265 1	leet

Average Depth to Water

Minimum Depth

Maximum Depth

20 feet

900 feet

Record Count 17

PLSS Search

Township 29N Range 07W

UTM locat on w d ri edf m PLSS ee H lp

The data is furnished by the NMOSE/ISC and is accepted by the cip ent with the expressed understanding that the couracy completeness reliability us bility or suitability for any particular purpose of the data.

warrant es expres ed o impl ed,

cerning th

1/10/17 5 42 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

#### DATA SHEET FOR DEEP BED CATHODIC PROTECTION WELLS NORTHWESTERN NEW MEXICO (SUBMIT 2 COPIES TO OCD AZTEC OFFICE)

30-039-21425

PPCO DESIGNATION FM-116

OPERATOR PHILLIPS PETROLEUM COMPANY FARMINGTON N M 87401

LOCATION 0 12 29 6

LEASE NUMBER 650112

(505) 599-3400

NAME OF WELL/S OR PIPELINE SERVED (1) SJ 29-6 UNIT #22A MV

(2) N/A

ELEVATION NA

COMPLETION DATE 11/09/78

300 FT TOTAL DEPTH

LAND FEDERAL

CASING INFO

SIZE NA

TYPE NA IN

DEPTH NA FT CEMENT USED NA

IF CEMENT OR BENTONITE PLUGS HAVE BEEN FLACED SHOW DEPTHS & AMOUNTS PLUG DEPTH NONE PLUG AMOUNT NONE

WATER INFORMATION

WATER DEPTH (FT) (1) 70 (2) -0-

WATER INFORMATION NA

DEPTHS GAS ENCOUNTERED (FT) NA

TYPE AND AMOUNT OF COKE BREEZE USED

COKE TYPE METALLURGICAL COKE BREEZE

COKE AMOUNT

3506 LBS

DEPTHS ANODES PLACED (FT)

160 190 200 210 220 230 240 250 260 270

DEPTH VENT PIPE PLACED (FT) 300

VENT PIPE PERFORATIONS (FT) TOP 150 BOTTOM 300

REMARKS -O-

IF ANY OF THE ABOVE DATA IS UNAVAILABLE PLEASE INDICATE SO COPIES OF ALL LOGS INCLUDING PRILLERS LOG WATER ANALYSIS & WELL BORE SCHEMATICS SHOULD BE SUBMITTED WHEN AVAILABLE UNPLUGGED ABANDONED WELLS ARE TO BE INCLUDED

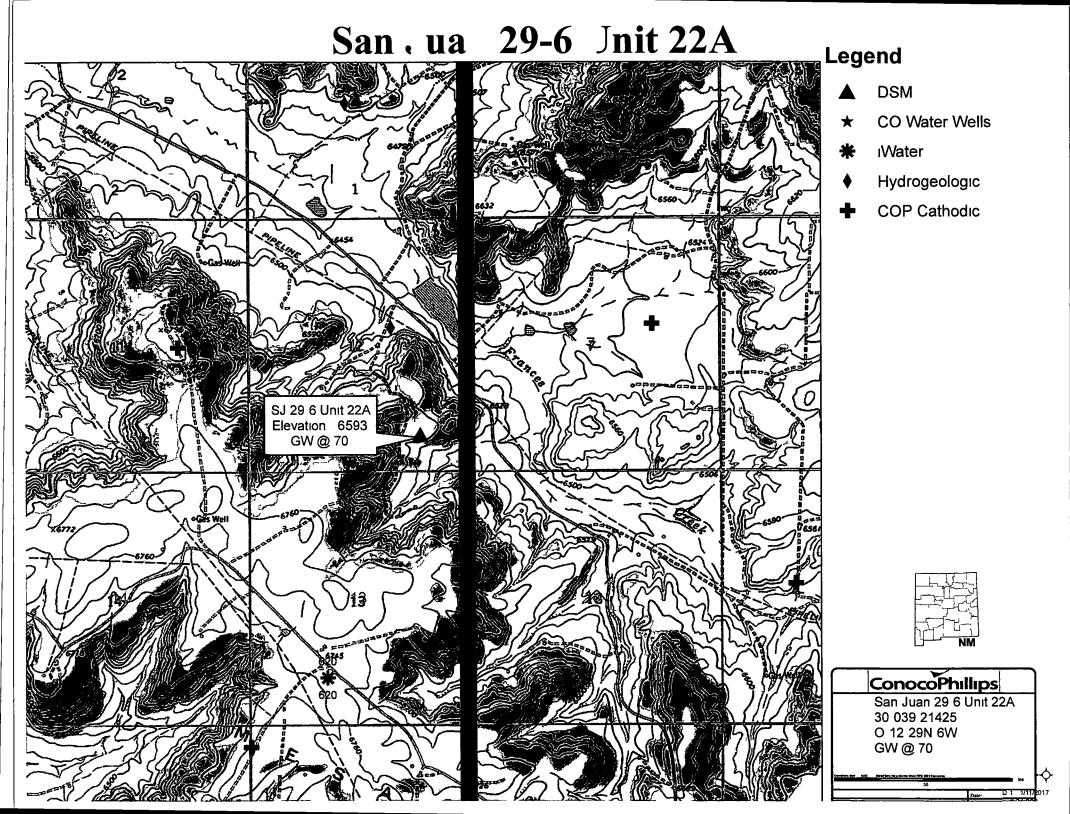
\* - LAND TYPE MAY BE SHOWN F-FEDEFAL I-INDIAN S-STATE P-FEE IF FEDERAL OR INDIAN ADD LEASE NUMBER

NA-INFORMATION NOT AVAILABLE

FEB21 1992 OIL CON. DIV.

DIST. 3

CC CP FILE--FARMINGTON HOUSTON



Sa . 1 an 29-6 J · 22A SJ 29 6 Unit 22A Elevation 6593 GW @ 70

# Legend

- ▲ DSM
- ★ CO Water Wells
- ★ iWater
- **♦** Hydrogeologic
- ♣ COP Cathodic



# ConocoPhillips

San Juan 29 6 Unit 22A 30 039 21425 O 12 29N 6W GW @ 70

#### **Below Grade Tank (BGT) Siting Criteria and Compliance Demonstrations**

Well Name San Juan 29-6 Unit 22A

- 1 <u>Depth to groundwater (should not be less than 25 feet)</u>
  The nearest recorded well with available water depth information is the **subject well** with groundwater @ 70 as indicated in the **Cathodic Data Sheet** attached
- 2 <u>Distance to watercourse (should not be within 100 feet of a continuously flowing watercourse, other significant watercourse, lakebed, sinkhole, wetland or playa lake [measured from the ordinary high water mark])</u>
  - Aerial map attached indicates that there are **no** lakebeds sinkholes, playa lakes or watercourses within 100 feet of the proposed Below Grade Tank
- 3 <u>Distance to springs or wells (should not be within 200 feet of a spring or a fresh water well used for public or livestock consumption)</u>
  - Aerial map attached indicates that the Below Grade Tank will **not** be within 200 feet of any recorded well or spring

#### Hydrogeological report for San Juan 29-6 Unit 22A

#### Regional Hydrogeological context

The San Jose Formation of Eocene age occurs in New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado-New Mexico State line and overlies the Animas Formation in the area generally north of the State line.

The San Jose Formation was deposited in various fluvial type environments. In general, the unit consists of an interbedded sequence of sandstone siltstone, and variegated shale. Thickness of the San Jose Formation generally increases from west to east (200 feet in the west and south to almost 2,700 feet in the center of the structural basin). Ground water is associated with alluvial and fluvial sandstone aquifers. Thus, the occurrence of ground water is mainly controlled by the distribution of sandstone in the formation. The distribution of such sandstone is the result of original depositional extent plus any post depositional modifications, namely erosion and structural deformation. Transmissivity data for San Jose Formation are minimal. Values of 40 and 120 feet squared per day were determined from two aquifer tests (Stone et al. 1983, table 5). The reported or measured discharge from 46 water wells completed in San Jose Formation ranges from 0.15 to 61 gallons per minute and the median is 5 gallons per minute. Most of the wells provide water for livestock and domestic use.

The San Jose Formation is a very suitable unit for recharge from precipitation because soils that form on the unit are sandy and highly permeable and therefore readily adsorb precipitation. However, low annual precipitation, relatively high transpiration and evaporation rates and deep dissection of the San Jose Formation by the San Juan River and its tributaries all tend to reduce the effective recharge to the unit

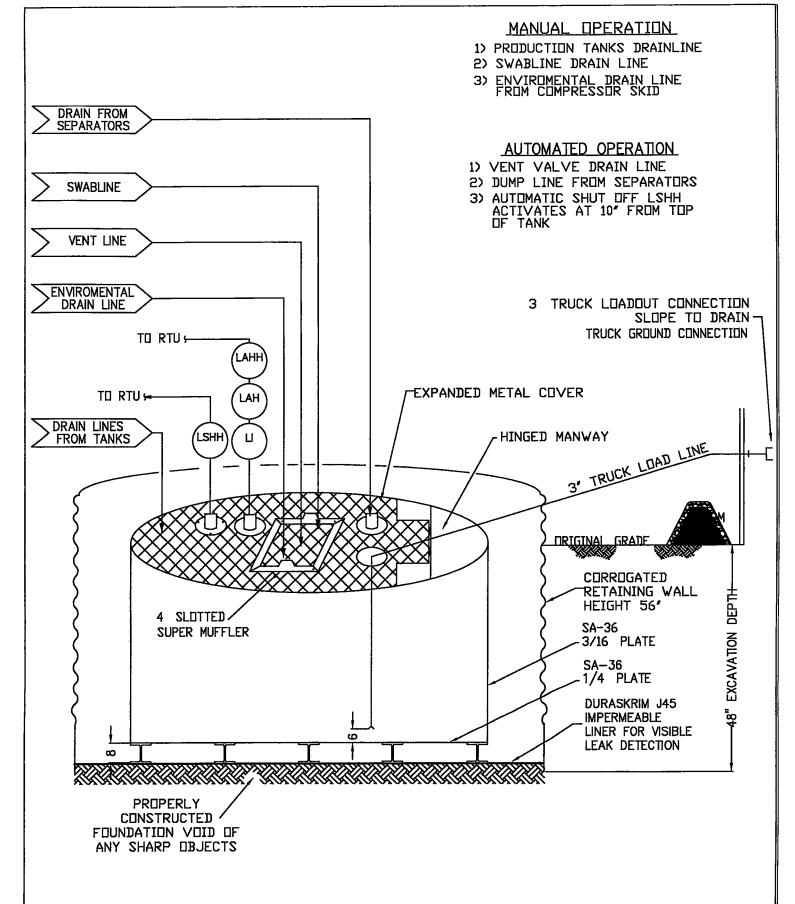
Stone et al 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p

#### **Below Grade Tank Design and Construction**

In accordance with NMAC 19 15 17 the following information describes the design and construction of below grade tanks on ConocoPhillips Company hereinafter known as COPC locations. This is COPC s standard procedure for all below grade tanks (BGT). A separate plan will be submitted for any BGT which does not conform to this plan.

#### General Plan

- 1 COPC will design and construct a properly sized and approved BGT which will contain liquids and should prevent contamination of fresh water to protect the public health and environment
- 2 COPC signage will comply with 19 15 17 11 C NMAC
- 3 COPC is requesting approval of an alternative fencing to be used on BGT tank locations. COPC requests to utilize 48 steel mesh field fence (hog wire) on the bottom with a single strand of barbed wire on top. T posts shall be installed every 12 feet and corners shall be anchored utilizing a secondary T post. BGTs will be fenced regardless of location.
  - a If the BGT is located within 1000 of an occupied permanent residence school hospital institution or church COPC will construct A 6 chain link fence with two strands of barbed wire on top. The operator shall ensure that all gates associated with the fence are closed and locked when responsible personnel are not onsite.
- 4 COPC will construct a screened expanded metal covering on the top of the BGT
- 5 COPC will ensure that a BGT is constructed of materials resistant to the BGT's particular contents and resistant to damage from sunlight as shown on design drawing and specification sheet
- The COPC BGT system will have a properly constructed foundation consisting of a level base free of rocks debris sharp edges or irregularities to prevent punctures cracks or indentations of the liner or tank bottom as shown on design drawing
- 7 COPC shall operate and install the BGT to prevent the collection of surface water run on COPC has built in shut off devices that do not allow a BGT to overflow COPC constructs berms and corrugated retaining walls at least 6 above ground to keep from surface water run on entering the BGT as shown on the design plan
- 8 If COPC needs to modify/retrofit the existing BGT it will meet the below specifications
- 9 COPC will construct and use a BGT that does not have double walls The BGT's side walls will be open for visual inspection for leaks the BGT's bottom is elevated a minimum of six inches above the underlying ground surface and the BGT is underlain with a geomembrane liner to divert leaked liquid to a location that can be visually inspected
- 10 COPC will equip below grade tanks with a properly functioning automatic high level shut off control device as well as manual controls to prevent overflows
- 11 COPC will utilize a geomembrane liner manufactured by Brawler Industries LLC as SuperScrim H45 SuperScrim H45 is manufactured with LLDPE and is 45 mil inch thickness and is reinforced with polyester scrim. The geomembrane liner has a hydraulic conductivity of less than 5 X 10 <sup>14</sup> cm/s and is resistant to ultraviolet light petroleum hydrocarbons salts and acidic and alkaline solutions. The manufacturer specific sheet is attached.
- 12 The general specification for design and construction are attached



# ConocoPhillips

San Juan Business Unit

PRODUCED WATER PIT TANK
OPEN TOP GRAVITY FLOW TANK
INTERNALLY COATED WITH
12-14 MILS AMERON AMERCOAT 385



# SuperScrim™ H Product Specifications

This product meets GRI GM 25 Specifications

Properties	Frequency	Minimum Average Value			
			, Hed	H86	HAS
Thickness Nominal (mils) Min Ave (mils)	ASTM D5199	Per roll	30 27	36 32	45 40
Weight Nominal (lb/1000 ft²) Min Ave (lb/1000 ft²)	ASTM D5261	Per roll	140 125	168 151	210 189
Grab Tensile Strength (lb) min ave Elongation (%) min ave	ASTM D7004 (each direction) (each direction)	30 000 lb	300 25	310 25	320 25
Tongue Tear (lb) min ave	ASTM D5884 (each direction)	30 000 lb	130	130	130
Index Puncture (lb) min ave	ASTM D4833	30 000 lb	85	103	105
Ply Adhesion (lb) min ave (1)	ASTM D6636	30 000 lb	20	25	25
Oxidative Induction Time (OIT) (2) (a) Standard OIT Or	ASTM D3895	Formulation	>100	>100	>100
(b) High Pressure OIT	ASTM D5885		>1000	>1000	>1000
	Sandard Follo	्रम् ३- ब्लॉर्हाहाराजो	No.		S. 10 18 18
Roll Width (3) ft			11 83	11 83	11 83
Roll Length (3) ft	1500	1230	1000		
Roll Area ft <sup>2</sup>			17 745	14 551	11 830

()Alternatively an acceptable ply adhesion is to have a film tearing bond occur within the sheet material (2)The Manufacturer has the option to select either one of the OIT methods listed to evaluate the antioxidant effectiveness in the geomembrane.

<sup>(3)</sup>Roll widths and lengths have a tolerance of  $\pm 1\%$ 

Custom material thicknesses also available

This data is pr ided fo i f rm to nal purposes only Brawl I dustries LLC makes no warranties as to the suitability of the fitness for a specific use or merchantability of products referred to no guarantee of satisfactory results upon contained information or recommendations and disclaims all liability from resulting loss or damage. This information is subject to change without notice please heck with Brawler Industries LLC for current updates

This is a preliminary data sheet based upon laboratory testing of initial manufacturing lots and may be changed without notice as additional product testing data becomes available.





2015 Brawler, Industries, LLC &

MILES CITY MT 184 Hwy 59 N Miles City MT 59301 800 488.3592 406.234 1680 MIDLAND TX 11701 Co Rd 125 W Midland TX 79711 800.583 6005 432 563 4005 PLEASANTON TX 4300 S Hwy 281 Pleasanton TX 78064 830 569 4005

HOUSTON, TX 8615 Gölden Spike Ln Houston TX-77086 800 364 7688 281 272-1660



### SuperScrim™ WC Product Specifications

Properties	Test Method	Minimum Average Values								
	**	9 mil	12 mil	16 mil	20 mil î	24 mil	30 mil			
Weight	D5261	5 4 oz/yd <sup>2</sup>	5 7 oz/yd²	7 2 oz/yd²	9 6 oz/yd <sup>2</sup>	11 5 oz/yd²	13 4 oz/yd <sup>2</sup>			
Thickness		9 mil	12 mıl	16 mil	20 mil	24 mıl	30 mıl			
Grab Tensile (lbs )	D751	MD 200 CD 135	MD 210 CD 176	MD 230 CD 210	MD 330 CD 286	MD 352 CD 300	MD 352 CD 300			
Mullen Burst	D6241	300 psi	350 psi	400 psi	600 psı	680 psi	780 psi			
Accelerated UV Weathering	D4355	>80% after 2000 hrs exposure	>90 % after 2000 hrs exposure	>90 / after 2000 hrs exposure	>90 / after 2000 hrs exposure	>90 % after 2000 hrs exposure	>90% after 2000 hrs exposure			
		Standard	Roll Dimensio	ns)						
Roll Length (2) Ft		3 000	3 000	4 000	3 000	2 250	2 250			
Roll Width (2) Ft		12	12	12	12	12	12			
Roll Area Ft <sup>2</sup>		36 000	36 000	48 000	36 000	27 000	27 000			

 $^{(1)}\!9$  of 10 views shall be Category 1 or 2. No more than 1 view from Category 3  $^{(2)}\!R$  oli widths and lengths have a tolerance of  $\pm$  1%

Custom material thicknesses also available

This data is provided for informational purposes only Brawler Industries LLC makes no warranties as to the suitability of the fitness for a specific use or merchantability of products referred to no guarantee of satisfactory results upon contained information or recommendations and disclaims all liability from resulting loss or damage. This information is subject to change without notice please check with Brawler Industries. LLC for current updates.



© 2014 Brawler Industries LLC

MILES CITY MT 184 Hwy 59 N Miles City MT 59301 800 488 3592 406 234 1680 MIDLAND TX 11701 Co Rd 125 W Midland TX 79711 800 583 6005 432 563 4005 PLEASANTON TX 4300 S Hwy 281 Pleasanton TX 78064 830 569 4005 HOUSTON, TX 1 8615 Golden Spike Ln Houston TX 77086 800.364 7688 281.272.1660

# ConocoPhillips Company San Juan Asset Below Grade Tank Maintenance and Operating Plan

In accordance with Rule 19 15 17 the following information describes the operation and maintenance of a below grade tank (BGT) on a Burlington Resources Oil & Gas Company LP (COP) location This is COP is standard procedure for all BGT is A separate plan will be submitted for any BGT which does not conform to this plan

#### **General Plan**

- 1 COP will operator and maintain a BGT to contain liquids and solids and maintain the integrity of the liner liner system and secondary containment system to prevent contamination of fresh water and protect public health and the environmental COP will perform an inspection on a monthly basis install cathodic protection and automatic overflow shutoff devices as seen on the design plan
- 2 COP will not discharge into or store any hazardous waste in the BGT
- 3 COP shall operator and install the BGT to prevent the collection of surface water run on COP has built in shut off devices that do not all ow a BGT to overflow COP constructs berms and corrugated retained walls at least 6 above grade to keep surface water run on from entering the BGT as shown on the design plan
- 4 As per 19 15 17 12 D(3) COP will inspect the BGT for leakage and damage at least monthly The operator will document the integrity of each tank at least annually and maintain a written record for 5 years. Inspections may include 1) containment berms adequate and no oil present, 2) tanks had no visible leaks or sign of corrosion. 3) tank valves, flanges, and hatches had no visible leaks and 4) no evidence of significant spillage of produced liquids. COP shall remove any visible or measurable layer of oil from the fluid surface of the BGT in an effort to prevent significant accumulation of oil overtime.
- 5 COP shall maintain adequate freeboard to prevent overtopping of the BGT
- 6 If a BGT develops a leak then COP shall removal all liquid above the damage or leak within 48 hours of discovery notify the appropriate division office pursuant to 19 15 29 NMAC and repair the damage or replace BGT as applicable
- 7 If COP discovers a BGT designed in accordance with 19 15 17 11 I(5) has lost integrity the BGT will promptly be drained and removed from service and COP will follow the approved closure plan. If COP discovers a retrofitted BGT designed in accordance with 19 15 17 11 I(4)(a c) does not demonstrate integrity or that the BGT develops any of the conditions identified in Paragraph (5) of Subsection A of 19 15 17 12 NMAC shall repair the damage or close the existing BGT pursuant to the closure requirements of 19 15 17 13 NMAC
- 8 If COP equips or retrofits the existing BGT to comply with Paragraphs (1) through (4) of Subsection I of 19 15 17 11 NMAC COP shall visually inspect the area beneath the BGT during the retrofit and document any areas that are wet discolored or showing other evidence of a release on form C 141 COP shall measure and report to the division the concentration of contaminants in the wet or discolored soil with respect to the standards set forth in Table I of 19 15 17 13 NMAC. If there is no wet or discolored soil or if the concentration of contaminants in the wet or discolored soil is less than the standard set forth in Table I of 19 15 17 13 NMAC, then COP will proceed with the closure requirements of 19 15 17 13 NMAC prior to initiating the retrofit or replacement

# ConocoPhillips Company San Juan Asset Production BGT Closure Plan

In accordance with Rule 19 15 17 13 NMAC the following plan describes the general closure requirements of a below grade tank (BGT) on any ConocoPhillips Company (COP) location in the San Juan Asset This is COP s standard closure procedure for all BGT s regulated under Rule 19 15 17 NMAC and operated by COP For those closures which do not conform to this standard closure plan a separate BGT specific closure plan will be developed and utilized

#### **Closure Conditions and Timing for BGT**

- Within 60 days of cessation of operation COP will
  - o Remove all liquids and sludge and dispose in a division approved manner
- Within 72 hours or 1 week prior to closure COP will
  - Give notice to surface owners by certified mail For public entities by email as specified on the variance page
  - o Give notice to Division District Office verbal or in writing/email
- Within 6 months of cessation of operation COP will
  - Remove BGT and dispose recycle reuse or reclaim in a division approved manner
  - o Remove unused onsite equipment associated with the BGT
- Within 60 days of closure COP will
  - Send the Division District Office a Closure Report per 19 15 17 13 F (1)

#### **General Plan Requirements**

- 1 Prior to initiating any BGT closure except in the case of an emergency COP will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or 1 week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.
- 2 Notice of closure will be given to the Division District office between 72 hours and 1 week of the scheduled closure via email or phone. The notification of closure will include the following
  - a Operators Name
  - b Well Name and API Number
  - c Location
- 3 All liquids will be removed from the BGT following cessation of operation Produced water will be disposed of at one of COP s approved Salt Water Disposal facilities or at a Division District Office approved facility
- 4 Solids and sludge s will be shoveled and/or vacuumed out for disposal at one of the Division District Office approved facilities depending on the proximity of the BGT site Envirotech Land Farm (Permit #NM-01 011) Industrial Ecosystems Inc. JFJ Land Farm (Permit #NM 01 0010B) and Basin Disposal (Permit #NM 01 005)
- 5 COP will obtain prior approval from the Division District Office to dispose recycle reuse or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division District Office. Fiberglass tanks will be empty cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19 15 35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste. Management under NMED Permit SWM 052426.
- 6 Any equipment associated with the BGT that is no longer required for some other purpose following the closure will be removed

- 7 Following removal of the tank and any liner material COP will test the soils beneath the BGT as follows
  - a At a minimum a five point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination
  - b The laboratory sample shall be analyzed for the constituents listed in Table I of 19 15 17 13

Table I										
Closure Criteria for Soils Beneath Below Grade Tanks Drying Pads Associated with Closed Loop Systems and Pits										
where Contents are Removed										
Depth below bottom of pit to	Constituent	Method*	Limit**							
groundwater less than 10 000										
mg/l TDS										
	Chloride	EPA 300 0	600 mg/kg							
≤50 feet	TPH	EPA SW-846 Method 418 1	100 mg/kg							
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg							
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg							
	Chloride	EPA 300 0	10 000 mg/kg							
51 feet 100 feet	TPH	EPA SW 846 Method 418 1	2 500 mg/kg							
	GRO+DRO	EPA SW 846 Method 8015M	1 000 mg/kg							
Ţ	BTEX	EPA SW 846 Method 8021B or 8260B	50 mg/kg							
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg							
	Chloride	EPA 300 0	20 000 mg/kg							
> 100 feet	TPH	EPA SW 846 Method 418 1	2 500 mg/kg							
	GRO+DRO	EPA SW-846 Method 8015M	1 000 mg/kg							
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg							
	Benzene	EPA SW 846 Method 8021B or 8015M	10 mg/kg							

<sup>\*</sup>Or other test methods approved by the division

(19 15 17 13 NMAC Ro 19 15 17 13 NMAC 3/28/2013)

- 8 If the Division District Office and/or COP determine there is a release COP will comply with 19 15 17 13 C 3b
- 9 Upon completion of the tank removal pursuant to 19 15 17 13 C 3c if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19 15 17 13 NMAC the excavation will be backfilled with non waste containing earthen material compacted and covered with a minimum of one foot top soil or background thickness of top soil whichever is greater. The surface will then be re-contoured to match the native grade prevent ponding of water, and prevent erosion of cover material.
- 10 For those portions of the former BGT area no longer required for production activities COP will seed the disturbed area in the first favorable growing season following the closure of the BGT Seeding will be accomplished via drilling on the contour whenever practical or by other Division District Office approved methods COP will notify the Division District Office when reclamation and re-vegetation is complete

Reclamation of the BGT shall be considered complete when

- Established vegetative cover reflects a life form ratio of +/ 50% of pre disturbance levels
- Total plant cover is at least 70% of pre disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19 15 17 13 H 5d COP will comply with obligations imposed by other applicable federal or tribal agencies in which there re vegetation and reclamation requirements provide equal or better protection of fresh water human health and the environment

<sup>\*\*</sup>Numerical limits or natural background level whichever is greater

11 For those portions of the former BGT area required for production activities reseeding will be done at well abandonment and following the procedure noted above

#### **Closure Report**

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using Division District Office Form C 144 The Report will include the following

- Proof of Closure Notice (surface owner and Division District Office)
- Backfilling & cover installation
- Confirmation Sampling Analytical Results
- Application Rate & Seeding techniques
- Photo Documentation of Reclamation

#### Hydrogeological report for San Juan 29-6 Unit 22A

#### Regional Hydrogeological context

The San Jose Formation of Eocene age occurs in New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado New Mexico State line and overlies the Animas Formation in the area generally north of the State line.

The San Jose Formation was deposited in various fluvial-type environments. In general the unit consists of an interbedded sequence of sandstone, siltstone, and variegated shale. Thickness of the San Jose Formation generally increases from west to east (200 feet in the west and south to almost 2,700 feet in the center of the structural basin). Ground water is associated with alluvial and fluvial sandstone aquifers. Thus, the occurrence of ground water is mainly controlled by the distribution of sandstone in the formation. The distribution of such sandstone is the result of original depositional extent plus any post-depositional modifications, namely erosion and structural deformation. Transmissivity data for San Jose Formation are minimal. Values of 40 and 120 feet squared per day were determined from two aquifer tests (Stone et al. 1983 table 5). The reported or measured discharge from 46 water wells completed in San Jose Formation ranges from 0.15 to 61 gallons per minute and the median is 5 gallons per minute. Most of the wells provide water for livestock and domestic use

The San Jose Formation is a very suitable unit for recharge from precipitation because soils that form on the unit are sandy and highly permeable and therefore readily adsorb precipitation. However, low annual precipitation, relatively high transpiration and evaporation rates, and deep dissection of the San Jose Formation by the San Juan River and its tributaries all tend to reduce the effective recharge to the unit

Stone et al, 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p