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.

## Proposed Alternative Method Permit or Closure Plan Application

or proposed alternative method  **Instructions: *Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request see 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 romnent. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.  **Portion of the operator of its pollution of the operator of its pollution.  **Portion of the operator of its pollution of
Section   Sect
perator: ConocoPhillips Company OGRID # 217817  ddress: P.O. Box 4289, Farmington, New Mexico 87499  Cility or well name: SAN JUAN 29-6 UNIT 72A  PI Number: 30-039-21344 OCD Permit Number: JAN 1 0 2017  L or Qtr/Qtr F Section 22 Township 29N Range 6W County: Rio Arriba  enter of Proposed Design: Latitude 36.714680 °N Longitude 107.454027 °W NAD: 1927 1983   perface Owner: Federal State Private Tribal Trust or Indian Allotment    Pit: Subsection F, G or J of 19.15.17.11 NMAC   Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no     Clined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other     String-Reinforced   State Welded Factory Other Volume: bbl Dimensions: L x W x D     Delow-grade tank: Subsection I of 19.15.17.11 NMAC   Compared
OIL CONS. DIV DIST. 3
Oll CONS. DIV DIST. 3   Oll CONS. DIV DIST. 3   Oll CONS. DIV DIST. 3
SAN JUAN 29-6 UNIT 72A   OCD Permit Number:   JAN 1 0 2017
PI Number:30-039-21344
Comparison of Proposed Design: Latitude
enter of Proposed Design: Latitude 36.714680
Pit: Subsection F, G or J of 19.15.17.11 NMAC   Subsection F, G or J of 19.15.17.11 NMAC   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   Pactory   Other   Volume:   bbl Dimensions: L   x W   x D     Below-grade tank: Subsection I of 19.15.17.11 NMAC
Pit: Subsection F, G or J of 19.15.17.11 NMAC   Emporary: Drilling Workover   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   Pactory Other Volume: bbl Dimensions: L x W x D   Below-grade tank: Subsection I of 19.15.17.11 NMAC
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   Volume:   bbl Dimensions: L   x W   x D     Below-grade tank: Subsection I of 19.15.17.11 NMAC
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   Volume:   bbl Dimensions: L   x W   x D     Below-grade tank: Subsection I of 19.15.17.11 NMAC
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   Volume:   bbl Dimensions: L   x W   x D     Below-grade tank: Subsection I of 19.15.17.11 NMAC
Lined   Unlined Liner type: Thickness mil   LLDPE   HDPE   PVC   Other     String-Reinforced   Nelded   Factory   Other   Volume: bbl Dimensions: L x W x D     Below-grade tank: Subsection I of 19.15.17.11 NMAC
String-Reinforced  ner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D  Below-grade tank: Subsection I of 19.15.17.11 NMAC  Welded Factory Other Volume: bbl Dimensions: L x W x D  L x W x D
Below-grade tank: Subsection I of 19.15.17.11 NMAC   Volume:bbl Dimensions: Lx Wx D
Below-grade tank: Subsection I of 19.15.17.11 NMAC  V Closure Standard modified due  1. 0.2   2.1   2.1   2.1    1. 0.2   2.2   2.1   2.1    1. 0.2   2.2   2.1   2.1    1. 0.2   2.2   2.2   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1   2.1    1. 0.3   2.2   2.1    1. 0.3   2.3    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3   2.1    1. 0.3   2.3
0/2/10 10: pose 2: poss/2014
ank 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
ner type: Thickness45mil
Alternative Method:
abmittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
encing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
encing: 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,

6.  Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other	
☐ Monthly inspections (If netting or screening is not physically feasible)	
7.	
Signs: Subsection C of 19.15.17.11 NMAC	
☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	
☑ Signed in compliance with 19.15.16.8 NMAC	
8.	
Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.	
Please check a box if one or more of the following is requested, if not leave blank:	
☑ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.	
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9.	
Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of 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.	☐ Yes ☒ No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
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. ( <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
<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
Topographic map, Visual inspection (certification) of the proposed site	
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
<ul> <li>application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland.  - , US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
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 doc 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:	NMAC 15.17.9 NMAC
II.  Multi Wall Fluid Management Pit Charlist. Subsection D of 10.15.17.0 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 doc 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	15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

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 attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment  Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan  Emergency Response Plan  Oil Field Waste Stream Characterization  Monitoring and Inspection Plan  Erosion Control Plan  Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	documents are
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 Fall Alternative  Proposed Closure Method: Waste Excavation and Removal  Waste Removal (Closed-loop systems only)  On-site Closure Method (Only for temporary pits and closed-loop systems)  In-place Burial On-site Trench Burial  Alternative Closure Method	Fluid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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	
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 south 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	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

	☐ 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
<ul> <li>Within an unstable area.</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 FEMA map	Yes No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plans 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 19.15.17.13 NMAC  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 cann 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	.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 believe the property of the complete to the best of my knowledge and believe the property of the complete to the best of my knowledge and believe the property of the complete to the best of my knowledge and believe the complete the complete to the best of my knowledge and believe the complete th	ief.
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	Lander
OCD Representative Signature: Approval Date: 3 37  Title: OCD Permit Number:	2017
OCD Representative Signature: Approval Date: 3 37	the closure report.
OCD Representative Signature:  Title:  OCD Permit Number:  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.	the closure report.

22.	
Operator Closure Certification:	
	is closure report is true, accurate and complete to the best of my knowledge and
belief. I also certify that the closure complies with all applicable closu	re requirements and conditions specified in the approved closure plan.
Norma (Drink)	T!d -
Name (Print):	Title:
C:	D. (
Signature:	Date:
e-mail address:	Telephone:

#### San Juan 29-6 Unit 72A (BELOW GRADE TANK)

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 at all times, regardless of location.

#### 2. Geo-membrane Liner

- The geo-membrane liner consists of a 45-mil flexible LLDPE material manufactured by Raven Industries as J45BB. This product is a four layer reinforced laminated containing no adhesives. The outer layers consist of a high strength polyethylene film manufactured using virgin grade resins and stabilizers for UV resistance in exposed applications. The J45BB is reinforced with 1300 denier (minimum) tri-directional scrim reinforcement. It exceeds ASTMD3083 standard by 10%. J45BB has a warranty for 20 years from Raven Industries and is attached. It is typically used in Brine Pond, Oilfield Pit liner and other industrial applications. The manufacture specific sheet is attached and the design attached displays the proper installation of the liner.
- 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,

(quarters are 1=NW 2=NE 3=SW 4=SE) C=the file is closed) (quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

		<b>POD</b>												
		Sub-		Q	Q	Q								Water
POD Number	Code	basin	County	64	16	4	Sec	Tws	Rng	X	Y	DepthW	VellDepthWate	r Column
SJ 00038			RA	3	4	4	06	29N	06W	276923	4069867*		813	
SJ 00059			RA	2	2	2	35	29N	06W	283371	4063065*	6	365 12	0 245
SJ 00059 S			RA	2	2	2	35	29N	06W	283371	4063065*		335 12	0 215
SJ 00059 S-2			RA	4	4	4	26	29N	06W	283381	4063267*		565 27	5 290
SJ 00059 S-3			RA	3	2	2	35	29N	06W	283171	4062865*		561 14	6 415
SJ 02794			RA	2	2	2	12	29N	06W				280 14	0 140
SJ 03364			RA	1	4	3	13	29N	06W	284070	4066662*		900 62	0 280
SJ 03392			RA	4	4	3	20	29N	06W	277798	4065022*		210	
SJ 03393			RA	2	4	4	30	29N	06W	276951	4063634*		210	
<u>SJ 03406</u>			RA	4	3	3	05	29N	06W	277525	4069858*		900 38	520
SJ 03481			RA	4	4	3	20	29N	06W	277798	4065022*		250	
SJ 04014 POD1			RA	3	4	3	12	29N	06W	283530	4060940		378	
SJ 04119 POD1			SJ	2	1	4	18	29N	06W	276660	4067201		480 340	0 140

Average Depth to Water:

267 feet

Minimum Depth:

120 feet

Maximum Depth:

620 feet

Record Count: 13

PLSS Search:

Township: 29N

Range: 06W

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

1/9/17 3:59 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER

## TIERRA CORROSION CONTROL, INC. DRILLING LOG

COMPANY: ConocoPhillips LOCATION: San Juan 26-6 91F

STATE: NM BIT SIZE: 7 7/8'

LBS COKE BACKFILL: 2,600# ANODE TYPE: 2" X 60" Duriron DATE: April 4, 2008

LEGALS: S21 T29N R6W DRILLER: Eugene Silago

CASING SIZE/TYPE: 8" X 20' PVC

VENT PIPE: 300' ANODE AMOUNT: 10 COUNTY: San Juan

DEPTH: 300'

COKE TYPE: Asbury PERF PIPE: 180' – 300' BOULDER DRILLING: None

DEPTH	DRILLER'S LOG	AMPS	DEPTH	DRILLER'S LOG	AMPS
20	Sand Stone		310		
25			315		
30			320		
35			325		
40			330		
45			335		
50		.8	340		
55		.9	345		
60		1.0	350		
65		.9	355		
70		.8	360		
75		.7	365		
80		.6	370		
85		.4	375		
90		.3	380		
95		.2	385		
100		.3	390		
105		.3	395		
110	•	.5	400		
115	Shale	2.1	405		
120		2.2	410		
125		2.3	415		
130		2.4	420		
135		2.5	425		
140		2.4	430		
145		2.6	435		
150		2.3	440		
155		2.4	445		
160		2.5	450		
165		2.7	455		
170		2.2	460		
175		2.1	465		
180		2.0	470		
185		2.1	475		
190		2.0	480		
195		2.1	485		
200		2.2	490		
205		2.2	495		
210		2.2	500		
215		2.3			
220		2.3			
225		2.4			
230		2.4			_
240		2.6			
245 250		3.2			
255		2.6			
	-				
260		2.6			
265		3.0			
270		3.1			
275		3.0			_
280		2.9			
285		2.9			_
290		2.9			
295		2.1			
300	V	2.0			
305					

			A THE RESERVE OF THE PARTY OF T
ANODE #	DEPTH	NO COKE	COKE
1	290	2.9	4.8
2	280	2.9	5.6
3	270	3.1	5.6
4	260	2.6	5.5
5	250	3.2	5.9
6	240	2.6	5.6
7	230	2.4	5.5
8	220	2.3	5.3
9	210	2.2	4.8
10	200	2.2	5.0
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			

WATER DEPTH: 110' ISOLATION PLUGS: None LOGING VOLTS: 12.5

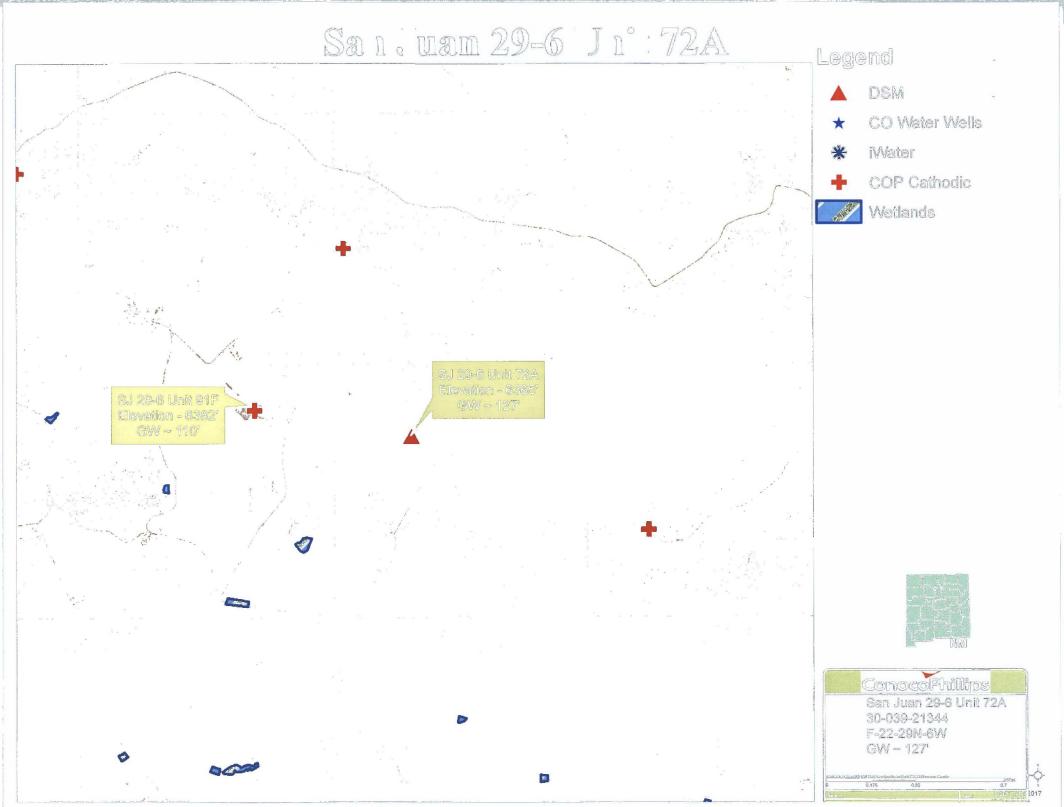
**VOLT SOURCE: AUTO BATTERY** 

TOTAL AMPS: 17.0

TOTAL GB RESISTANCE: .73

REMARKS:

San uan 29-6 Jni 72A Legend **DSM** CO Water Wells iWater **COP** Cathodic Wetlands SJ 29-6 Unit 72A Elevation - 6365' GW ~ 127' Elevation - 6382' GW ~ 110' ConocoPhillips San Juan 29-6 Unit 72A 30-039-21344 F-22-29N-6W GW ~ 127'



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

Well Name: \_San Juan 29-6 Unit 72A\_

- Depth to groundwater (should not be less than 25 feet):
   The nearest recorded well with available water-depth information is the San Juan 29-6
   Unit 91F with groundwater @ 110' as indicated in the Cathodic Data Sheet attached.
   The subject well is 17' more in elevation making depth to groundwater at 127'.
- 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 72A

#### 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.

# ConocoPhillips Company San Juan Basin Below Grade Tank Design and Construction

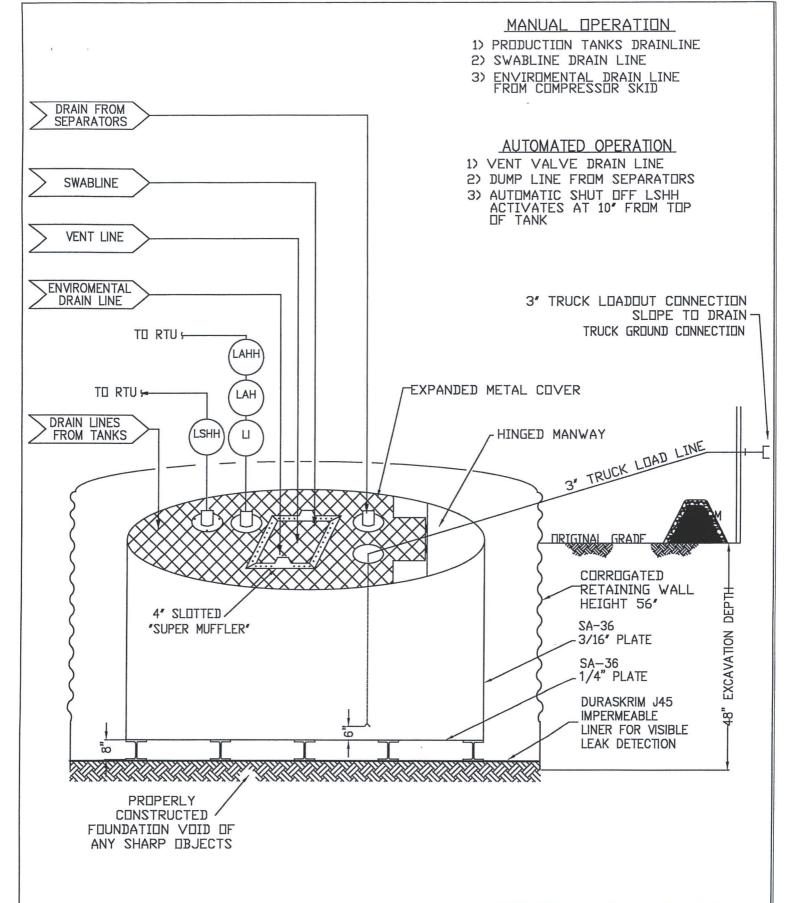
In accordance with NMAC 19.15.17 the following information describes the design and construction of below-grade tanks on ConocoPhillips Company, hereinafter known as COP, locations. This is COP's standard procedure for all below grade tanks (BGT). A separate plan will be submitted for any BGT which does not conform to this plan.

#### **General Plan:**

- COP 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. COP signage will comply with 19.15.17.11.C NMAC.
- 3. COP will construct all new fences around the BGT 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. BGTs will be fenced at all times regardless of location.
  - a. If the BGT is located within 1000 feet of an occupied permanent residence, school, hospital, institution or church, COP will construct all new fences utilizing 72" chain link security 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. COP will construct a screened, expanded metal covering, on the top of the BGT.
- 5. COP 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.
- 6. The COP 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. COP shall operate and install the BGT to prevent the collection of surface water run-on. COP has built in shut off devices that do not allow a BGT to overflow. COP 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 COP needs to modify/retrofit the existing BGT it will meet the below specifications.
- 9. COP 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. COP has equipped the BGT's with the ability to detect high level in the tank and provide alarm notification and shutdown process streams into the tank. Once high level is detected RTU logic closes the inlet separator sales valve and does not permit vent valve to open. This shutdown of the sales valve and gagging of the vent valves prevents any hydrocarbon process streams from entering the pit tank once a high level is detected. Furthermore, an electronic page is sent to the Operator for that well site and to the designated contract "Water-Hauling" Company indicating a high level and that action

must be taken to address this alarm. The environmental drain line from COP's compressor skid under normal operating conditions is in the open position. The environmental drain line is in place to capture any collected rain water or spilled lubricants from our compressor skids. The swab drain line is a manually operated drain and by normal operating procedures is in the closed position. The tank drain line is also a manually operated drain and during normal operations it is in the closed position.

- 11. The geomembrane liner consists of a 45-mil flexible LLDPE material manufactured by Raven Industries as J45BB. This product is a four layer reinforced laminated containing no adhesives. The outer layers consist of a high strength polyethylene film manufactured using virgin grade resins and stabilizers for UV resistance in exposed applications. The J45BB is reinforced with 1300 denier (minimum) tri-directional scrim reinforcement. It exceeds ASTMD3083 standard by 10%. J45BB has a warranty for 20 years from Raven Industries and is attached. It is typically used in brine Pond, Oilfield Pit liner and other industrial applications. The manufacture specific sheet is attached and the design attached displays the proper installation of the liner.
- 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

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 10-14 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.

#### **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.
- 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.
- 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.
- 6. 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.
- 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



## SuperScrim™ H Product Specifications

This product meets GRI GM 25 Specifications

This product meets are as a secondarione								
Properties	Test Method	Frequency	Minimu	m Average	Values			
			H30	H36	H45			
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			
Standard Roll Dimensions								
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			

(DAlternatively, an acceptable ply adhesion is to have a film tearing bond occur within the sheet material.

(DThe Manufacturer has the option to select either one of the OIT methods listed to evaluate the

antioxidant effectiveness in the geomembrane.

 $^{(3)}$ Roll widths and lengths have a tolerance of  $\pm 1\%$  \*Custom material thicknesses also available

"Custom material thicknesses also available
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to the suitability of the fitness for a specific use or merchantability of products referred to, no guarantee
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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.





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### SuperScrim™ WC Product Specifications

Properties	Test Method	Minimum Average Values						
		9 mil	12 mil	16 mil	20 mil	24 mil	30 mil	
Weight	D5261	5.4 oz/yd <sup>2</sup>	5.7 oz/yd <sup>2</sup>	7.2 oz/yd <sup>2</sup>	9.6 oz/yd <sup>2</sup>	11.5 oz/yd <sup>2</sup>	13.4 oz/yd <sup>2</sup>	
Thickness		9 mil	12 mil	16 mil	20 mil	24 mil	30 mil	
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 psi	680 psi	780 psi	
Accelerated UV Weathering	D4355	>80% after 2000 hrs exposure	>90% after 2000 hrs exposure					
Standard Roll Dimensions								
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.  $^{(2)}Roll$  widths and lengths have a tolerance of  $\pm$  1%

Custom material thicknesses also available

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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 Golden Spike Ln Houston, TX : 77986 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's standard procedure for all BGT's. A separate plan will be submitted for any BGT which does not conform to this plan.

#### General Plan:

- 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:
  - o 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:
  - o Send the Division District Office a Closure Report per 19.15.17.13.F (1).

#### **General Plan Requirements:**

- 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.

Closure Criteria for Soils Beneat	h Below-Grade Tai	Table I nks, Drying Pads Associated with Closed-Loop	Systems and Pits
		ontents are Removed	
Depth below bottom of pit to	Constituent	Method*	Limit**
groundwater less than 10,000			
mg/I 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
Umas	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
NAS	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