

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

FEB 27 2015

FORM APPROVED  
OMB NO. 1004-0135  
Expires: July 31, 2010

**SUNDRY NOTICES AND REPORTS ON WELLS**  
*Do not use this form for proposals to drill or to re-enter an abandoned well. Use form 3160-3 (APD) for such proposals.*

**SUBMIT IN TRIPLICATE - Other instructions on reverse side.**

1. Type of Well <input checked="" type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other		5. Lease Serial No. 751141038
2. Name of Operator BRIDGECREEK RESOURCES COLO LLC Contact: CHRISTINE CAMPBELL Email: ccampbell@palomarnr.com		6. If Indian, Allottee or Tribe Name UTE MOUNTAIN UTE
3a. Address 8100 SOUTHPARK WAY, SUITE A1 LITTLETON, CO 80127	3b. Phone No. (include area code) Ph: 303-668-8318	7. If Unit or CA/Agreement, Name and/or No.
4. Location of Well (Footage, Sec., T., R., M., or Survey Description) Sec 19 T31N R14W NWNE 666FNL 1971FEL 36.891898 N Lat, 108.348346 W Lon		8. Well Name and No. PRAIRIE FALCON 19-1
		9. API Well No. 30-045-35628-00-X1
		10. Field and Pool, or Exploratory VERDE GALLUP
		11. County or Parish, and State SAN JUAN COUNTY, NM

12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation (clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleat horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports shall be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompleat in a new interval, a Form 3160-4 shall be filed once testing has been completed. Final Abandonment Notices shall be filed only after all requirements, including reclamation, have been completed, and the operator has determined that the site is ready for final inspection.)

Bridgescreek Resources (CO), LLC respectfully submits the attached corrective reclamation plans and cuttings sampling procedures for the Prairie Falcon 19-1 well location and reserve pit.

OIL CONS. DIV DIST. 3

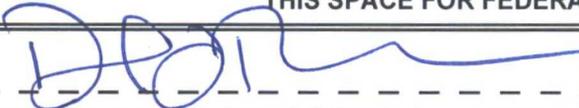
MAR 30 2015

14. I hereby certify that the foregoing is true and correct.

**Electronic Submission #293339 verified by the BLM Well Information System For BRIDGECREEK RESOURCES COLO LLC, sent to the Durango Committed to AFMSS for processing by BARBARA TELECKY on 03/03/2015 (15BDT0143SE)**

Name (Printed/Typed) CHRISTINE CAMPBELL	Title REGULATORY SPECIALIST
Signature (Electronic Submission)	Date 02/27/2015

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved By 	Title <i>Unsc</i>	Date <i>3/19/15</i>
Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.		Office TRES RIOS FIELD OFFICE

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

\*\* BLM REVISED \*\*

NMOCD

10



Adkins Consulting, Inc.  
180 E. 12<sup>th</sup> Street, Suite #5 Durango, CO 81303  
(505)793-1140

---

February 26, 2015

Mr. Ryan Joyner  
Bureau of Land Management  
Tres Rios Field Office  
Land and Minerals  
15 Burnett Court  
Durango, CO 81301

RE: Notice of Non-Compliance. Bridgecreek Resources. Prairie Falcon 19-1. Sec. 19, T31N.R1.  
Lease #751-14-1038.

Mr. Joyner:

On the behalf of Bridgecreek Resources (Bridgecreek), Adkins Consulting Inc. (ACI) is pleased to submit this reclamation plan in response to the Notice of non-compliance dated January 28, 2015 for the above referenced location.

This workplan contains three tasks:

- I. Final reclamation of disturbance outside of permitted area and well pad interim Reclamation
- II. Well pad sampling.
- III. Reserve pit sampling and closure.

We propose to perform reclamation activities and close the reserve pit within 180-days of drilling completion. Drilling was completed on January 28, 2015. Reclamation activities will occur during one mobilization event.

## **1 Final and Interim Reclamation**

### **1.1 Final Reclamation for area outside of permitted area**

The area defined as "Fenced Unauthorized Disturbance" as shown on Plate 1 will be reclaimed using reclamation methods as outlined below. The 50 x 150 foot disturbance area was not authorized per the approved APD.

Final reclamation of the unauthorized disturbance area shall include:

- Removal of existing fence.

- Redistribution of stockpiled soil for reuse during permitted location interim reclamation activities (see Plate 2).
- Final reclamation for the unauthorized area shall follow reclamation specifications as referenced in the Surface Use of Operations (SUPO) and the approved APD and summarized below:

*The disturbed area shall be recontoured to match surrounding topography and a rangeland drill will be used to drill the following mixture of seed:*

- a) Western Wheat grass at seven (7) pounds of pure live seed per acre, and*
- b) Blue Grama at three (3) pounds of pure live seed per acre, and*
- c) Indian Rice grass at six (6) pounds of pure live seed per acre.*

*Seeding will occur during the first favorable season. Periodic checks will be made of the seeded area. If, within one year, no visible strands are observed, reseeding will be required. Contact will be made with the Ute Mountain Ute Agency prior to reclamation activities.*

*The Operator is responsible for controlling and eradicating noxious weeds within the reclaimed area during the term of the lease. A list of noxious weeds is available from the Montezuma County Weed Control program at (970) 565-0580.*

- Reclamation shall occur during interim reclamation of the well pad.

## **1.2 Reclamation of off-pad west disturbance**

Surface disturbance from vehicular traffic occurred in an area west of the well pad as shown on Plate 1. Vehicular traffic within this disturbance area caused compression of native grasses and undisturbed soils. The area shall be raked and overseeded with the above listed seed mixture.

Reclamation shall occur during interim reclamation of the well pad. Periodic checks will be made of the seeded area. If, within one year, no visible strands are observed, reseeding will be required. Contact will be made with the Ute Mountain Ute Agency prior to reclamation activities.

The Operator is responsible for controlling and eradicating noxious weeds within the reclaimed area during the term of the lease. A list of noxious weeds is available from the Montezuma County Weed Control program at (970) 565-0580.

## **1.3 Interim Reclamation of well pad**

Interim reclamation of the well pad shall occur during the closure of the reserve pit. Interim reclamation of the well pad will follow the specifications outlined in the SUPO and approved APD. In summary, interim reclamation shall include:

- Reducing the well size pad as shown by the interim reclamation area (Plate 2).
- Removal of perimeter fencing.
- Distribution of spoil piles for reserve pit solidification and closure.
- Distribution of spoil piles to provide soil for contouring the surface to blend in with surrounding topography.

- Distribution of topsoil to provide a soil cap for seeding and revegetation.
- Seeding the area with a rangeland seed mix composed of:
  - a) Western Wheat grass at seven (7) pounds of pure live seed per acre, and
  - b) Blue Grama at three (3) pounds of pure live seed per acre, and
  - c) Indian Rice grass at six (6) pounds of pure live seed per acre.

Seeding will occur during the first favorable seeding season. Periodic checks will be made of the seeded area. If, within one year, no visible strands are observed, reseeding will be required. Contact will be made with the Ute Mountain Ute Agency, when the company is ready to begin reclamation activities.

Operator is responsible for controlling and eradicating noxious weeds at the well pad and surrounding area during the term of the lease. A list of noxious weeds is available from the Montezuma County Weed Control program at (970) 565-0580.

## 2 Well Pad Sampling

Accidental spill and releases identified by Ryan Joyner of the BLM will be sampled at locations shown on Plate 3. After the Notice of non-Compliance and drilling rig demobilization, the area between the wellhead and reserve pit fence was smoothed and leveled to match existing well pad grade. The leveling of the surface has caused a mixing of the upper 3 to 4 inches of topsoil. Therefore, at sample locations SS-01 through SS-03, a discrete sample will be collected at approximately 6-inches below ground surface. A fourth sample, DT-01, will be collected from the air drill cuttings deposited on top of the western spoils pile. The soils samples will be analyzed for constituents listed in the UMU soil reclamation table. For clarification,

- TPH (EPA Method 8015M). The UMU table (COGCC Table 910-1) does not specify an EPA Method for TPH. It is important to understand that two TPH EPA methods can be used for analysis. Method 8015 Modified (8015M) analyzes the gasoline range organics (GRO; Carbon 6 to Carbon 12) and diesel range organics (DRO; Carbon 10 to Carbon 28) – the constituents of concern. In contrast, Method 418.1 analyzes the complete range (C8 to C40) from gasoline through lube oil, motor oil, grease, and waxes (i.e. paraffin) and other organic matter such as twigs, sticks, and other carbon containing material.
- Benzene using EPA Method 8260B

If analytical results exhibit chemical concentration below standards, no further action is required. A summary report with laboratory Certificate of Analysis showing compliance will be submitted to the BLM and the UMU Environmental Department.

If analytical results exceed concentration standards, the operator will contact the BLM and BIA to discuss reclamation alternatives.

## 3 Reserve Pit Closure

Reserve pit closure will occur within 180-days (6-months) of well completion. The reserve pit will be de-watered, allowed to dry via evaporation, then solidified using excavated material from the spoil piles.

The solidification mixing ratio will not exceed 3 parts clean to 1 part drill cuttings (3:1). A solidification mixing ratio will be mathematically calculated to determine if less than a 3:1 solidification mixing ratio will meet Ute Mountain Ute (UMU) soil reclamation concentration levels.

To determine if solidification of drill cuttings meet the UMU reclamation standards, a five-point composite sample will be obtained from the reserve pit. An additional 5-point composite sample will be obtained from the spoil piles to be used for the solidification mixing calculations representing the clean (background) soils. The composite samples will be analyzed for the constituents listed in the UMU soil reclamation table with the following variance requests from the Notice of non-compliance:

- TPH. The UMU table (COGCC Table 910-1) does not specify an EPA Method for TPH. It is important to understand that two TPH EPA methods can be used for analysis. Method 8015 Modified (8015M) analyzes the gasoline range organics (GRO; Carbon 6 to Carbon 12) and diesel range organics (DRO; Carbon 10 to Carbon 28) – the constituents of concern. In contrast, Method 418.1 analyzes the complete range (C8 to C40) from gasoline through lube oil, motor oil, grease, and waxes (i.e. paraffin) and other organic matter such as twigs, sticks, and other carbon containing material.

Futhermore, the New Mexico Oil Conservation Division (NMOCD) Pit Rule (NMAC 19.15.17) defines separate standards for EPA Methods 418.1 and 8015M. For depth to water greater than 100-feet NMOCD target concentration level for Method 418.1 is 2,500 mg/kg TPH. For Method 8015M (GRO + DRO) the NMOCD target concentration is 1,000 mg/kg. A test hole drilled at the location APD application process demonstrated that depth to water is greater than 100 feet below ground surface.

It is our understanding that the BLM adopts the more stringent of the two regulations - NMOCD vs UMU (COGCC).

Therefore, we propose to analyze TPH as follows:

- TPH using EPA Method 418.1 with an action level of 2,500 mg/kg (NMOCD).
  - TPH using EPA Method 8015M with an action level of 500 mg/kg (UMU table)
- Benzene using EPA Method 8260B. We ask for a variance to the Notice of non-compliance to use a target concentration of 0.17 mg/kg as listed in the UMU table. The Notice of non-compliance lists 0.2 mg/kg target level. This may have been a simple rounding-up oversight on the part of the BLM.
  - The Notice of non-compliance lists chlorides as part of the constituents of concern. The UMU table does not list chlorides. The UMU table uses SAR, EC, and pH in place of chlorides. NMOCD Pit Rule does list chlorides as part of the sampling requirements. For groundwater greater than 100-feet below ground surface the action level for chlorides is 80,000 mg/kg. Therefore, we ask for a variance to use 80,000 mg/kg as an action level for chlorides.

The reserve pit composite sample will be mathematically “mixed” with the soil spoils background composite sample to determine if the solidified material exceeds UMU soil reclamation concentration levels and the levels as requested in the above variances.

If calculations show that solidified material is below UMU soil reclamation levels, the reserve pit will be closed in-situ as described in the SUPO and approved APD:

- Pit liner shall be cut at the mud line and excess liner properly disposed of off-site.
- The reserve pit shall be capped with three feet of soil.
- The operator may elect to place a permanent marker in the center of the closure cell per NMOCD Pit Rule regulation.

A summary report with laboratory Certificate of Analysis showing compliance will be submitted to the BLM and the UMU Environmental Department along with notification of pit closure.

If calculations show that solidified material exceeds UMU soil reclamation levels, the operator will contact the BLM and BIA to discuss alternative closure methods.

If you have any questions or comments please contact me at 970-570-9535.



---

Andrew Parker  
Adkins Consulting, Inc  
Durango, CO  
970-570-9535  
andrew@adkinsenvironmental.com

Cc: Christine Campbell, Bridgescreek Resources  
John Thompson, Walsh Engineering

# Plates

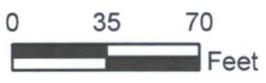
---



© 2015 Microsoft Corporation © 2015 Nokia © AND

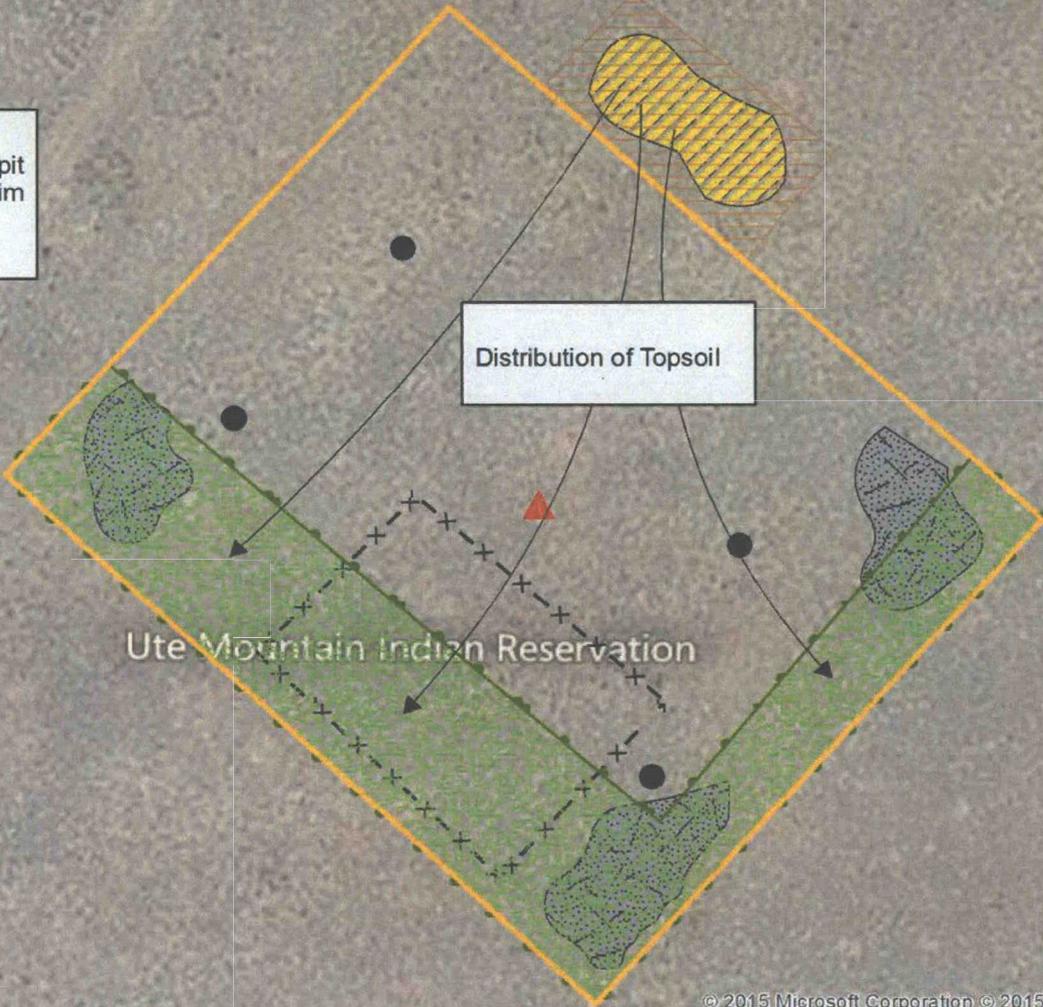
**Legend**

-  Wellhead
-  Anchor Tie
-  Fenced Unauthorized Disturbance
-  Well Pad
-  Excavation Spoils
-  Reserve Pit Fence
-  Stockpiled Topsoils
-  Vehicular Disturbance



 <p><b>Adkins Consulting Inc.</b> 180 East 12th Street Durango, CO 81303 505-793-1140</p>	Final Reclamation of Unauthorized Areas	Plate 1
	Bridgecreek Resources Prairie Falcon 19-1	February 2015

Excavation soil spoils will be used for reserve pit solidification and surface re-contouring of interim reclamation area.



**Legend**

- Wellhead
- Anchor Tie
- Well Pad
- Fenced Unauthorized Disturbance
- Excavation Spoils
- Interim Reclamation
- Reserve Pit Fence
- Stockpiled Topsoils

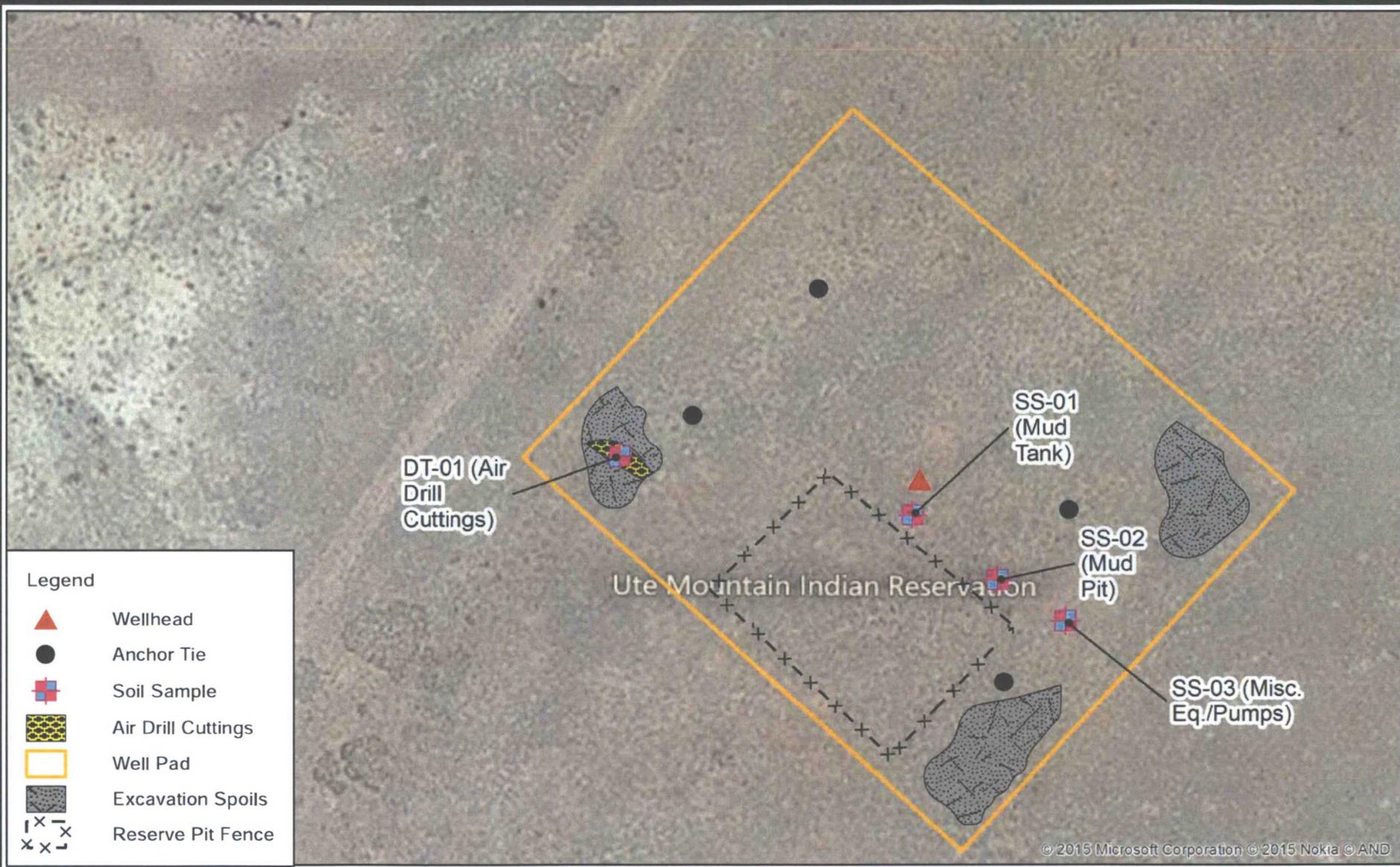
© 2015 Microsoft Corporation © 2015 Nokia © AND



Adkins Consulting Inc.  
 180 East 12th Street  
 Durango, CO 81303  
 505-793-1140

Interim Reclamation of Well Pad  
 Bridgecreek Resources  
 Prairie Falcon 19-1

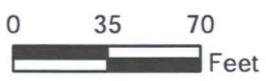
Plate 2  
 February 2015



© 2015 Microsoft Corporation © 2015 Nokia © AND

**Legend**

-  Wellhead
-  Anchor Tie
-  Soil Sample
-  Air Drill Cuttings
-  Well Pad
-  Excavation Spoils
-  Reserve Pit Fence




**Adkins Consulting Inc.**  
 180 East 12th Street  
 Durango, CO 81303  
 505-793-1140

**Surface Soil Sampling**  
 Bridgecreek Resources  
 Prairie Falcon 19-1

**Plate 3**  
 February 2015