NM1 - ___9_____

FACILITY CLOSURE PLAN APPROVAL

June 2015

Jones, Brad A., EMNRD

From:	Jones, Brad A., EMNRD
Sent:	Wednesday, July 01, 2015 8:53 AM
To:	'Shacie Murray'; Griswold, Jim, EMNRD; jeff davis (jdaguamoss@hotmail.com); Ryan Davis
Cc:	Powell, Brandon, EMNRD (Brandon.Powell@state.nm.us); Perrin, Charlie, EMNRD
Subject:	RE: NM1-9-0 Closure Plan Amendment

The Oil Conservation Division (OCD) has reviewed Agua Moss, LLC's (Agua Moss) proposed amendment to Agua Moss' facility closure and post-closure care plan, dated June 1, 2015 and approved by OCD on June 2, 2015, regarding the location in which Agua Moss plans to store equipment removed for the closure and post-closure of the OCD permitted commercial surface waste management facility: Agua Moss Surface Waste Management Facility Permit NM-1-009. Based on the information provided, the closure and post-closure care plan **is hereby approved** with the following understandings and conditions:

1. Agua Moss shall comply with all applicable requirements of the Surface Waste Management Facilities Rule (19.15.36 NMAC), the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), and all conditions specified in this approval;

2. Agua Moss shall ensure that the closure and post-closure activities identified in the June 1, 2015 submittal are completed as proposed in the facility closure and post-closure care plan; and

3. Agua Moss shall inventory and store equipment removed for the closure and post-closure of the OCD permitted Agua Moss Surface Waste Management Facility Permit NM-1-009 at the Agua Moss parcel of land located at 345B CR Road 350, Aztec New Mexico 87410, rather than at M&R Trucking Inc. facility yard located at 281 CR 350, Farmington, New Mexico, as specified in the original OCD approved June 1, 2015 facility closure and post-closure care plan.

4. Agua Moss shall obtain written approval from OCD prior to implementing any changes to the June 1, 2015 facility closure and post-closure care plan.

Please be advised that approval of this request does not relieve Agua Moss of liability if its operations result in pollution of surface water, ground water, or the environment. Nor does approval relieve Agua Moss of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones

Environmental Engineer

BAJ/baj

Brad A. Jones

Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Shacie Murray [mailto:shacie@merrion.bz]
Sent: Tuesday, June 30, 2015 5:32 PM
To: Jones, Brad A., EMNRD; Griswold, Jim, EMNRD; jeff davis (jdaguamoss@hotmail.com); Ryan Davis
Subject: NM1-9-0 Closure Plan Amendment

Mr. Jones and Mr. Griswold,

Please see attached request for amendment approval regarding the location of equipment storage for the NM1-9-0 closure.

Thank you.

Shacie Murray

Merrion Oil & Gas
Operations Department
(505) 324-5324
shacie@merrion.bz

Jones, Brad A., EMNRD

From: Shacie Murray <shacie@merrion.bz>
Sent: Tuesday, June 30, 2015 5:32 PM
To: Jones, Brad A., EMNRD; Griswold, Jim, EMNRD; jeff davis (jdaguamoss@hotmail.com); Ryan Davis
Subject: NM1-9-0 Closure Plan Amendment
Attachments: 2015-6-30 Amendment for location Approval.pdf

Mr. Jones and Mr. Griswold,

Please see attached request for amendment approval regarding the location of equipment storage for the NM1-9-0 closure.

Thank you.

Shacie Murray

Merrion Oil & Gas
Operations Department
(505) 324-5324
shacie@merrion.bz

Agua Moss

June 30, 2015

Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department
Attn: Brad Jones and Jim Griswold
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Permit NM1-9-0
Closure Plan Amendment

Mr. Jones and Mr. Griswold,

Please find attached "Amendment to June 1, 2015 Closure Plan Permit NM1-9-0" requesting permission to change the location of equipment storage for the closure plan approved by the OCD June 2, 2015.

Thank you for your time. If you have any questions or concerns please contact me at shacie@merrion.bz or 505-324-5324.

Sincerely,

Agua Moss

Shacie Murray
Operations Department
shacie@merrion.bz

June 30, 2015

Amendment to June 1, 2015 Closure Plan

Permit NM1-9-0

Agua Moss, LLC

WHEREAS:

1. The closure and post closure plan for NM1-9-0, as approved by the NMOCD on June 2, 2015, states that equipment will be placed in inventory at M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM.

2. Agua Moss purchased a parcel of land, located at 345B Road 350 Aztec, NM 87410.

3. The parcel of land is not and has never been a part of the surface waste management facility, permit NM1-9-0.

4. In an effort to save money on storage fees and for convenience the storage location of equipment from the closure of NM1-9-0 shall be changed.

NOW THEREFORE, the closure plan is amended as follows:

Equipment will be inventoried and stored at the Agua Moss parcel of land located at 345B Road 350 Aztec, NM 87410.

State of New Mexico
Energy, Minerals and Natural Resources Department

June 2, 2015

Ms. Shacie Murray
Agua Moss, LLC
PO Box 600
Farmington, New Mexico 87499

RE: Facility Closure and Post-Closure Care Plan Review
Agua Moss, LLC - Commercial Surface Waste Management Facility
Permit NM1-009: Agua Moss Surface Waste Management Facility
Location: Section 2, Township 29 North, Range 12 West, NMPM
San Juan County, New Mexico

Dear Ms. Murray:

The Oil Conservation Division (OCD) has reviewed Agua Moss, LLC's (Agua Moss) facility closure and post-closure care plan, dated June 1, 2015, for the closure and post-closure of the OCD permitted commercial surface waste management facility: Agua Moss Surface Waste Management Facility Permit NM-1-009. Based on the information provided, the closure and post-closure care plan **is hereby approved** with the following understandings and conditions:

1. Agua Moss shall comply with all applicable requirements of the Surface Waste Management Facilities Rule (19.15.36 NMAC), the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), and all conditions specified in this approval;

2. Agua Moss shall ensure that the closure and post-closure activities identified in the June 1, 2015 submittal are completed as proposed in the facility closure and post-closure care plan; and

3. Agua Moss shall obtain written approval from OCD prior to implementing any changes to the June 1, 2015 facility closure and post-closure care plan.

Please be advised that approval of this request does not relieve Agua Moss of liability if its operations result in pollution of surface water, ground water, or the environment. Nor does approval relieve Agua Moss of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec
Carl Chavez, OCD Environmental Bureau, Santa Fe
Merrion Oil & Gas Corp., Ryan Davis, 610 Reilly Ave., Farmington NM 87401

Jones, Brad A., EMNRD

From:	Shacie Murray <shacie@merrion.bz>
Sent:	Monday, June 01, 2015 4:42 PM
To:	Jones, Brad A., EMNRD; Griswold, Jim, EMNRD
Cc:	Ryan Davis; Philana Thompson
Subject:	Official Submission of NM1-9-0 Closure Plan
Attachments:	2015-06-01 Closure Plan - Official OCD Submission.pdf

Mr. Jones and Mr. Griswold,

It is my pleasure to submit the closure plan for permit NM1-9-0 to the OCD for approval. The plan is attached and also uploaded to the FPT site, filezilla under NM9 then NM1-9 closure drafts, document dated 2015-06-01.

Thank you for your time and assistance getting us to this point. Agua Moss is eager and ready to start closure as soon as the plan is approved.

Shacie Murray

Merrion Oil & Gas
Operations Department
(505) 324-5324
shacie@merrion.bz

Agua Moss

June 1, 2015

Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department
Attn: Brad Jones and Jim Griswold
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Permit NM1-9-0
Closure Plan

Mr. Jones and Mr. Griswold,

Please find attached closure plan for Agua Moss Surface Waste Facility, permit NM1-9-0. The closure plan submission is for division approval.

Thank you for your patients and assistance in this matter. If you have any questions or concerns please contact me at shacie@merrion.bz or 505-324-5324.

Sincerely,

Agua Moss

Shacie Murray
Operations Department
shacie@merrion.bz

Closure Plan

Permit NM1-9-0

Agua Moss, LLC

PO Box 600

Farmington, NM 87499

Surface Waste Management Facility

SWNW S2, T29N, R12W

San Juan County, New Mexico

June 1, 2015

The majority of the Sunco property is bare ground. Trucks enter the facility from County Road 3500. No new material has been accepted to the below areas since transfer of ownership effective February 2012.

NM1-9-0 applies to the following:

1. Lined Evaporation Pond
2. Lined Skimmer Pit
3. Un-loading Facility
4. Cement Stabilization Pads
5. Landfarm

Action and Estimated Schedule

The closure plan will begin within 5 days of NMOCD approval. Landfarm closure schedule will be dependent on soil remediation but not to exceed 5 years.

1. (2 day) Preparation: Clean 2 pits, move 6 tanks, test soil, set trucks and trailers. Section B.
2. (2 days) Cement Stabilization Pads: Breakup and hauling of cement. Leak detection system soil sampling. Section C.
3. (2 days) Chlorine Storage Tanks and Air Compressors: Clean, inventory, removing liner, soil sampling. Section D.
4. (4 days) Evaporation Pond: Liner removal, leak detection system soil sampling. Section E.
5. (2 days) Cement Stabilization Pads: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system, soil sampling. Section C.
6. (2 days) Chlorine Storage Tanks and Air Compressors: Soil sampling results, removal of berms. Section D.
7. (2 days) Skimmer Pit: Removal of fencing, netting, and liner. Leak detection system soil sampling. Section F.
8. (10 days) Evaporation Pond: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system piping, sump, connecting pipe, secondary liner and geotextile liner, soil sampling. Section E.
9. (2 Days) Equipment: Removal of piping, NORM testing. Section G.
10. (7 days) Skimmer Pit: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system piping, sump, secondary liner and geotextile liner, and soil sampling. Section F.
11. (5 Days) Equipment: Clean, inventory, and soil sampling. Section G.
12. (1 Day) Clean End Dump Trailers and release. Section B.
13. (20 days) Dirt work of southern half of facility. Section I.
14. (1 year) Landfarm closure. Section H.
15. (20 days) Dirt work of north half of facility. Section I.
16. (30 days) Final closure report and re-vegetation. Section J.

Table of Contents

Table of Exhibits

19.15.36.18 CLOSURE AND POST CLOSURE PLAN FOR NM1-9-0

Surface Waste Management Facility Closure Procedures

A. General:

1. No Acceptance: No new material has been accepted to the un-loading facility, cement stabilization pads, evaporation pond, skimmer pit, or landfarm by Agua Moss, LLC since change of ownership effective February 2012.
2. During Closure Operations: Agua Moss will maintain the surface waste management facility to protect fresh water, public health and the environment, and will continue to adhere to permit requirements.
3. Records: Agua Moss will maintain records, for a period of not less than five years after the commercial facility's closure, reflecting the generator, the location of origin, the location of disposal within the commercial facility, the volume and type of oil field waste, the date of disposal and the hauling company for each load or category of oil field waste accepted at the commercial facility.
4. Spill or Release Protocol: In the event of a spill or release, Agua Moss will adhere to rule(s) 19.15.29 and/or 19.15.30 NMAC as appropriate. Release remediation will be demonstrated with the Aztec district office. The analyzed sample results and OCD's District Office confirmation of clean up or no further action determination will be sent to the Santa Fe state office in the closure report.
5. Waste Disposal: Tanks, equipment, cement stabilization pads used for oil treatment, pond, skimmer pit, and leak detection systems will be cleaned and BSW (Basic Sediment and Water) waste will be disposed of, as will soils from leak detection, soil below equipment, pond, pit, and pads, and soil from the landfarm as follows:
    i. Solids and Sludge:
        a. Envirotech Landfarm permit #NM-01-0011 or JFJ Landfarm permit #NM1-010-B, within all of the facilities permitted limits including the chloride limit of 1,000 mg/kg for Envirotech and 500 mg/kg for JFJ.
            - All waste, to and from all facilities, will be manifested with the submission of a C-138 form.
        b. San Juan County Landfill permit #241102 operated by Waste Management, with waste release approval from OCD Santa Fe division when applicable, per rule 19.15.35.8 NMAC, and WM requirements.
        c. Bondad Landfill permit #C.R.S. & 30-20-112 operated by WCA, Durango, CO.
    ii. Liquids
        a. All waste, to and from all facilities, will be manifested with the submission of a C-138 form.
        b. All transportation, to and from all facilities, of liquid waste will only be handled by certified haulers that have an approved C-133, a monthly

updated list of approved drivers can be found on OCD online at, http://www.emnrd.state.nm.us/OCD/statistics.html

c. All waste will be injected into the Class I, Sunco Disposal Well, permit # UICI-5-0, according to UICI-5 permit conditions and disposal of produced water, per rule 19.15.34.11 NMAC.

6. Equipment Cleaning: Cleaning of the equipment will be completed with a pressure washer, steam cleaner, and hydrovac process, in conjunction with IEI (Industrial Ecosystems Inc.).
   i. By utilizing the hydrovac process; the solids, liquids and/or sludge are vacuumed into a tank, transported to IEI facility, #49 CR 3150 Aztec, NM 87410, and centrifuged, following A5 procedures.
   ii. After being centrifuged, solids and liquids separate, the liquids will be transported back to the Sunco Disposal #1 for injection according to A5 procedures and the solids will be disposed of according to A5 procedures.

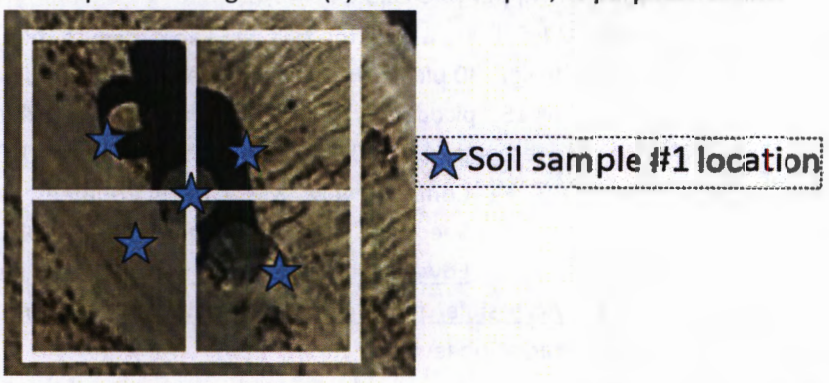
7. Testing for NORM, per rule 20.3.14 NMAC:
   i. If NORM levels are **above** the following according to rule 20.3.14.1403 NMAC:
      a. In soil, 30 picocuries/gram above background (Exhibit #2) of radium 226, or 150 picocuries/gram above background (Exhibit #2) in 15 cm layers, averaged over 100 square meters of any other NORM radionuclide.
         - Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.
      b. Accessible point for equipment, 50 mR/hr, including background radiation levels.
         - Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.
      c. Sludges and scales, within 1 cm of surface, 50 mR/hr, including background radiation levels (if over but a representative sample shows Radium 226 is less than 30 picocuries/gram material is exempt).

- Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.

ii. If NORM levels are acceptable, proceed with closure as outlined.

B. Preparation

1. Clean the Sludge Pit and Steel Pit #2 (see Exhibit #1 for detailed description) according to A6 procedures. Cleaning is all self-contained. All waste will be captured inside of the pits and properly disposed of according to A5 procedures. In the event of a spill or release A4 procedures will be followed.
   i. The Sludge Pit is now ready to hold material awaiting NORM testing.
   ii. Steel Pit #2 is now ready to be a containment for cleaning of materials.
2. The Saddle Tank, Sludge Tank #1, Sludge Tank #2, Empty Tank #1, Empty Tank #2, and Empty Tank #3 (see Exhibit #1 for detailed description) will be relocated to the south end of the facility with the other equipment. The tanks will be NORM tested and cleaned later in closure as described in Section G.
3. The site under the Saddle Tank, Sludge Tank #1, and Sludge Tank #2 will be sampled along with the site under both cement stabilization pads as described in Section C.
4. The site under the Empty Tank #1, Empty Tank #2, and Empty Tank #3 will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples, as purposed below.



   i. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.

ii. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.

iii. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

5. End Dump Trailers: Set up three (3) end dump trailers on location to hold and haul soil according to A5 procedures. Clearly mark the constituents allowed for the destination of the truck as follows (i. – iii.).

- After all of the contaminated soil has been removed (not including soil from the landfarm) all of the end dump trailers will be cleaned according to A6 procedures (cleaning is self-contained), in the event of a spill or release A4 procedures will be followed, and the trailers will be released.

i. The first trailer destination to Envirotech Landfarm:
   a. Chlorides cannot exceed 1,000 ppm
   b. At least 100 ppm of hydrocarbons

ii. The second trailer destination to San Juan Landfill:
   a. Chlorides exceeding 1,000 ppm
   b. No TPH
   c. Must have division's approval per rule 19.15.35.8.C.3.c NMAC.
   d. Contact Barbara Pinkerton at bpinkert@wm.com or 480-457-4795 at Waste Management for further constituent questions and additional testing requirements.

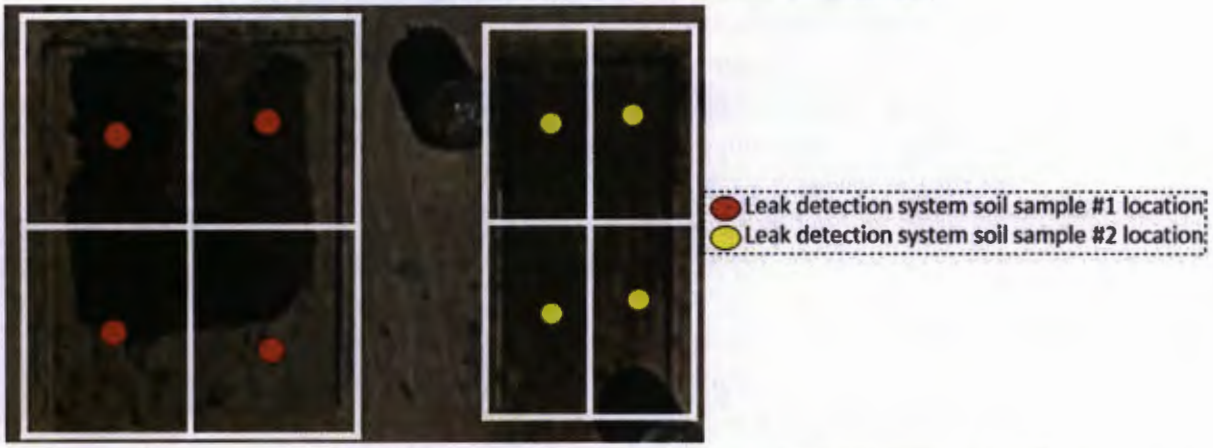
iii. The third trailer destination to Bondad Landfill:
   a. Soil that does not meet San Juan Landfill or Envirotech standards
   b. Contact Chantell Griffith at cgriffith@wcamerica.com for constituent questions.

6. Transportation Truck: Have a truck on site to hold and haul liners according to A5 procedures.

C. Cement Stabilization Pads

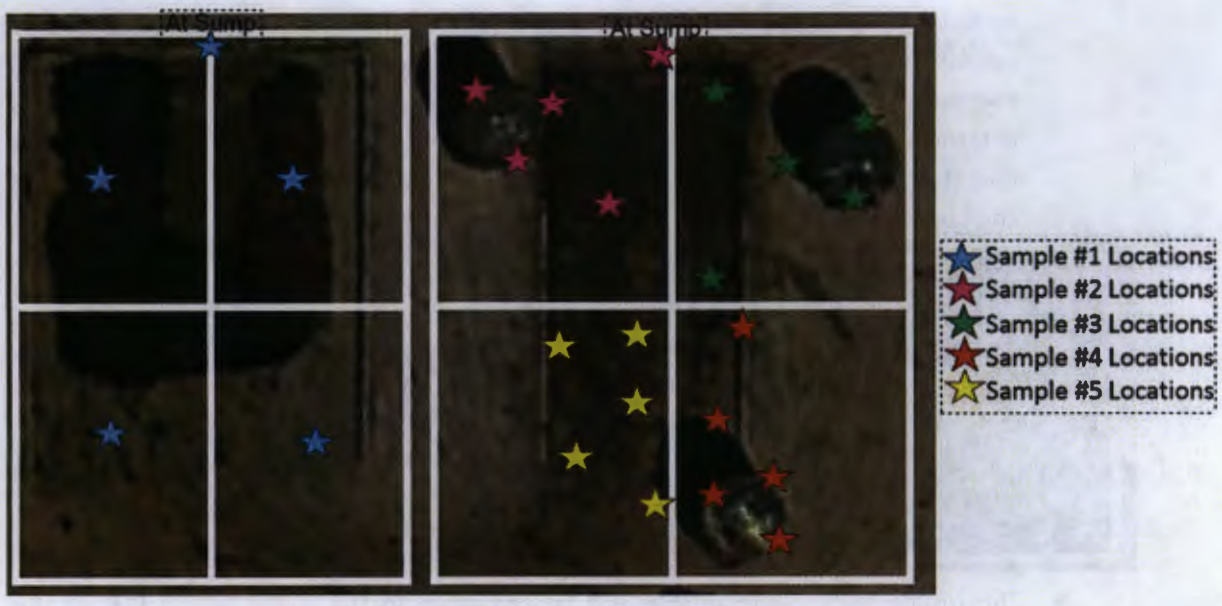
1. The cement of both pads will be broke into manageable pieces (3' by 3' per Bondad Landfill requirements) with a backhoe and placed onto a truck to be hauled to Bondad Landfill according to A5 procedures.
2. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4)

discrete samples under each pad, as purposed below. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.



i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.
ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

3. The leak detection system piping for both pads will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
4. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
5. The leak detection system liner for both pads will be removed in manageable pieces, cleaned in Steel Pit #2 and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
6. The removal equipment will be cleaned as needed over Steel Pit #2, so that all wastewater and overspray will be contained in the pit.
7. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
8. The site under both cement stabilization pads, the Saddle Tank, and both Sludge Tanks will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples under Pad #1, one (1) composite sample consisting of five (5) discrete samples in each grid quadrant of the grid overlying Pad #2, the Saddle Tank and both Sludge Tanks, as purposed below.



9. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.
10. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
11. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

D. Empty Chlorine Storage Tanks and Air Compressors

1. The chlorine tanks are empty and there are no lids or caps on the tanks.
2. Clean the empty chlorine storage tanks according to A6 and A5 procedures. Cleaning is self-contained within the tank. If a spill or release occurs A4 procedures will be followed.
3. Place tanks in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
4. Remove 8" PVC in manageable pieces, clean in Steel Pit #2, and place in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j.
5. Remove liner in manageable pieces, clean in Steel Pit #2, and load on truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
6. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
7. Place air compressors and air compressor building in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
8. The soil under the chlorine storage tanks and air compressor building will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test

methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least two (2) composite samples consisting of four (4) discrete samples, as purposed below.

9. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.
10. Berms will be removed and utilized in the re-contouring of the site.
11. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
12. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

E. Evaporation Pond

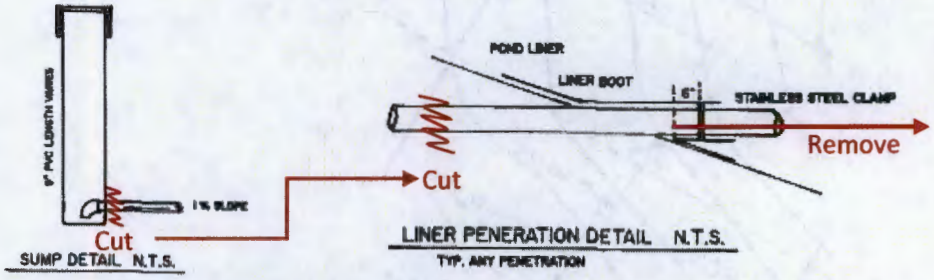
1. There is no liquid, solid, or sludge accumulation in the Evaporation Pond. In the event that liquid, solid, or sludge accumulation is discovered it will be removed by a vac-truck according A5 procedures.
2. In the event of a spill or release A4 procedures will be followed.
3. The liner of the Evaporation Pond will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will <u>not</u> need OCD approval).
4. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least two (2) composite samples consisting of four (4) random samples, as purposed below. If leak detection system soil is found on the interior slope of the pond, then additional samples

will be taken to ensure all soil is equally represented. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.

i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.

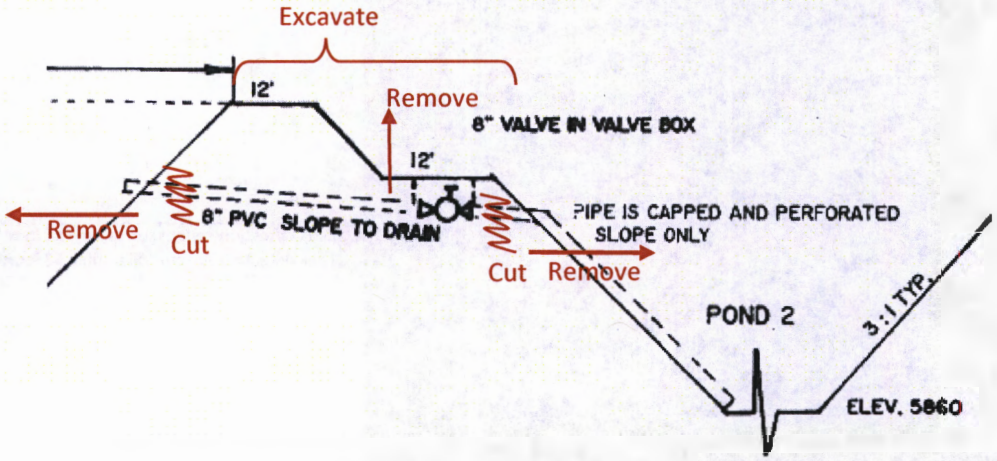
ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

5. The leak detection system piping will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
6. The sump, shown below, will be excavated. The pipe will be cut and pulled through on the pond side, shown below. The Sump, piping, and clamp will be removed, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.

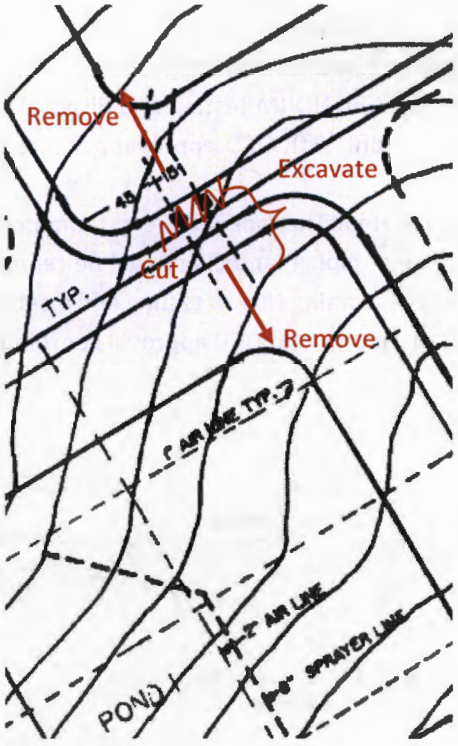


7. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.

8. The pipe and valve connecting the Skimmer Pit and Evaporation Pond will be excavated and removed as shown below, cleaned in Steel Pit #2, and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



9. The two pipes installed through the Evaporation Pond liner as overflow into the unlined pond will be excavated and removed as shown below, cleaned in Steel Pit #2, and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



10. Any remaining debris will be removed from the secondary liner via vac-truck and pressure washer according to A5 procedure. The secondary liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
11. The geotextile liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
12. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedure.
13. The site under the Evaporation Pond will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4) discrete samples in the sump system, with one discrete sample being at the point where the sump piping intersects the leak detection liner, one (1) composite sample consisting of four (4) discrete samples in the overflow piping area, with one discrete sample being at the point where each of the pipes intersect the leak detection liner, one (1) composite sample consisting of five (5) discrete samples in each of the four (4) grids, and one (1) composite sample consisting of three (3) discrete samples in the area where the pipe connecting the pit and pond was removed, with one discrete sample being at the point where the pipe intersects the leak detection liner, as purposed below.

14. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
15. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
16. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

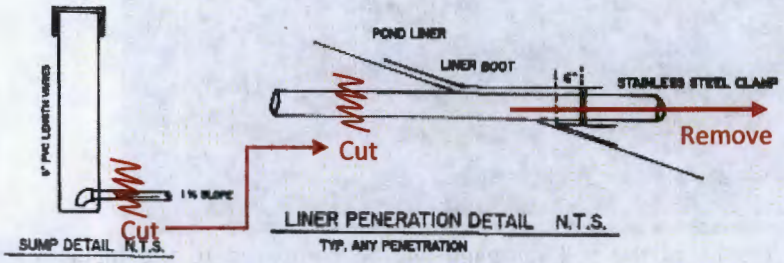
F. Skimmer Pit

1. All netting and fencing surrounding the Skimmer Pit will be removed and placed in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
2. There is no liquid, solid, or sludge accumulation in the Skimmer Pit. In the event that liquid, solid, or sludge accumulation is discovered it will be removed by a vac-truck according A5 procedures.
3. In the event of a spill or release A4 procedures will be followed.
4. The liner of the Skimmer Pit will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
5. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples, as purposed below. If leak detection system soil is found on the interior slope of the pond, then additional samples will be taken to ensure all soil is equally represented. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.

i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.

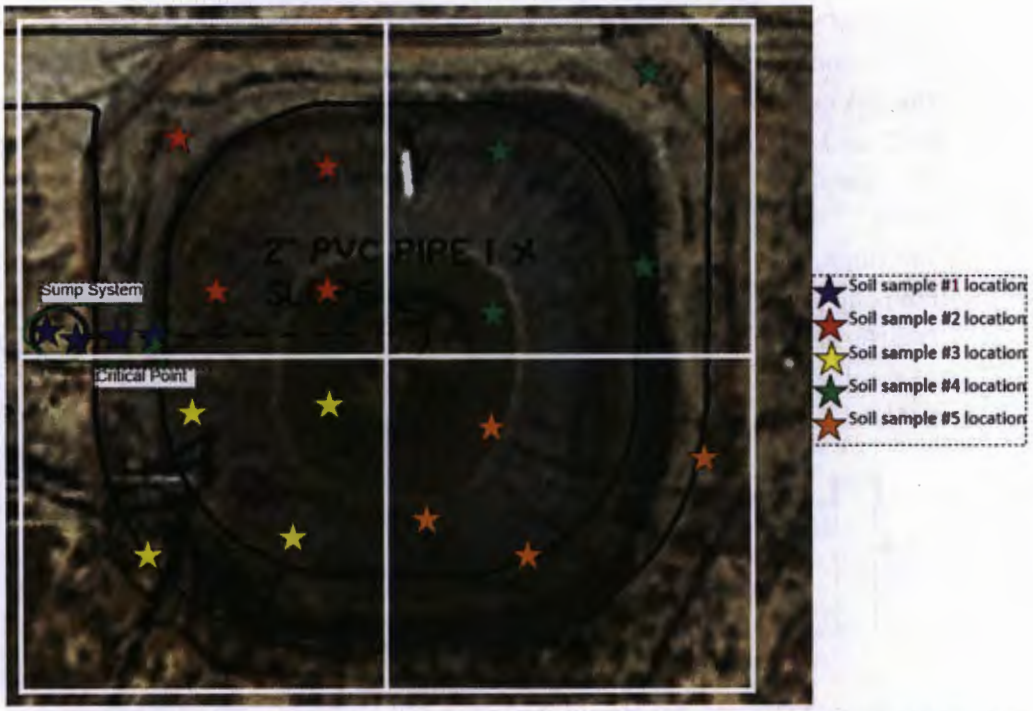
ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

6. The leak detection system piping will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
7. The sump, shown below, will be excavated. The pipe will be cut and pulled through on the pond side, shown below. The Sump, piping, and clamp will be removed, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



8. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 waste disposal of liquids.
9. Any remaining debris will be removed from the secondary liner via vac-truck and pressure washer according to procedure A5. The secondary liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
10. The geotextile liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
11. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 waste disposal of liquids.
12. The site under the Skimmer Pit will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite samples consisting of four (4) discrete samples in each of the four (4) grids under the liner and one (1) composite sample consisting of four (4) discrete samples in

the sump system, with one discrete sample being at the point where the sump piping intersects the leak detection liner, as purposed below.

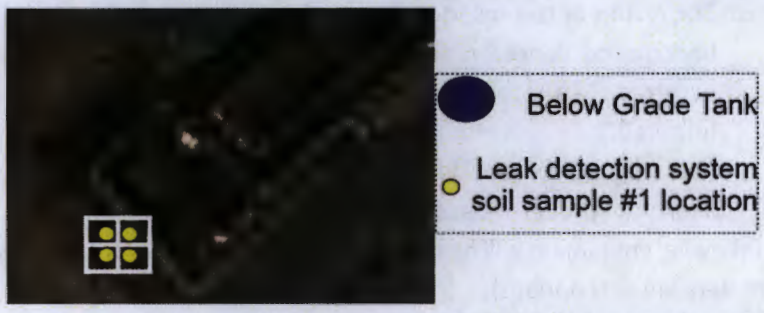


13. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
14. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
15. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

G. Equipment

1. The above and below ground piping connecting equipment to other equipment and the Skimmer Pit will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
    i. Any excavation will be backfilled in section I.
2. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
3. Shale Shaker Below Grade Tank Removal:
    i. The Below Grade Tank will be excavated, removed, and set aside to be tested for NORM and cleaned with the other equipment. Any piping within the tank will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.

ii. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4) discrete samples in each quadrant, as purposed below. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.



a. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.
b. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

iii. The leak detection system piping and any other piping associated with the tank will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.

iv. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.

v. The leak detection system liner will be removed in manageable pieces, cleaned in Steel Pit #2 and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).

vi. The removal equipment will be cleaned as needed over Steel Pit #2, so that all wastewater and overspray will be contained in the pit.

vii. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.

viii. The site under the tank will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX

as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4) discrete samples in each grid quadrant, as purposed below.

ix. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.

x. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.

4. The following equipment will be tested for NORM according to A7 procedures (see Exhibit #1 for detailed descriptions):
    - Piping and valve in the Sludge Pit
    - Sludge Pit
    - Steel Pit #1, #2, and #3
    - Shale Shaker Below Grade Tank
    - 4 Storage Tanks
    - 2 Sludge Tanks
    - Saddle Tank
    - 3 Empty Tanks
    - Separator
5. If NORM test are below limits, the piping and contents of Sludge Pit will be placed on a truck and disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.j NMAC with division's prior written authorization.
6. If NORM test are below limits, the equipment listed above (except for the piping and valve which have been disposed of) will be cleaned according to A6 procedures.
7. Cleaning of the equipment is all self-contained. All waste will be captured inside of the equipment and properly disposed of according to A5 procedures.
8. In the event of a spill or release A4 procedures will be followed.
9. The cleaned equipment, trailer office, and storage house will be placed in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
10. The site under the Equipment will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal

sections, per rule 19.15.36.18.D.1.b. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples in each of the four (4) grids, as purposed below.

11. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
12. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
13. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

H. Landfarm Cell #1 and Cell #2

1. No Acceptance: Agua Moss has not accepted any additional lifts to the landfarm cells since taking over operations February of 2012.
2. Compliance: Agua Moss will ensure compliance with 19.15.36.15 NMAC and permit conditions during closure activities by the following procedures.
3. Disking biweekly and approved bioremediation will continue until soil within both cells are remediated to the standards provided in Subsection F of 19.15.36.15 NMAC, also in Section 6.ii. below, or otherwise approved by the division.
4. Reports: Annual reports of vadose zone and treatment zone sampling will be submitted to the divisions Santa Fe office until the division has approved the facility's final closure, per rule 19.15.36.18.D.4.g NMAC.
5. Vadose Zone Monitoring
    i. Samples taken from the vadose zone in each cell at depth of two (2) to three (3) feet below the cells original ground surface, per permit conditions and transitional provision 19.15.36.20 NMAC.
    ii. The results of each sampling will be compared to the higher of the PQL or the background, Exhibit #2, soil concentrations to determine whether a release has occurred.

a. In the event of a release Agua Moss will notify Santa Fe office of the exceedance, and immediately collect and analyze a minimum of four randomly selected, independent samples for TPH, BTEX, chlorides and the constituents listed in Subsections A and B of 20.6.2.3103 NMAC. The results of the re-sampling event and a response action plan will be submitted for the division's approval within 45 days of the initial notification. The response action plan will address changes in the landfarm's operation to prevent further contamination and, if necessary, a plan for remediating existing contamination, per rule 19.15.36.15.E.5 NMAC.

iii. Copies of the monitoring reports will be kept in a form readily accessible for division inspection, per rule 19.15.36.15.E.4 NMAC.

iv. Quarterly Monitoring:
   a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
      - TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36
      - BTEX as determined by EPA SW-846 method 8021B or 8260B

v. Semi-annual Monitoring:
   a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
      - Chlorides as determined by EPA method 300.1

vi. Annual Monitoring:
   a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
      - Major cations/anions
      - WQCC metals

vii. Five Year Monitoring:
   a. Collection and analysis of four (4) randomly selected, independent sample from the vadose zone for:
      - Constituents listed in Subsections A and B of 20.6.2.3103 NMAC as determined by EPA SW-846 methods 6010B or 6020 or other methods approved by the division.

6. Treatment Zone Monitoring and Closure Performance Standards

i. Semi-annual Monitoring:
   a. Collection and analysis of one (1) composite sample, consisting of four (4) discrete samples from the treatment zone for:
      - TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36
      - Chlorides as determined by EPA method 300.1

ii. Closure Standards:

a. Soil treatment will continue until the contaminated soil has been remediated to the higher of the background concentrations (Exhibit #2) or the following closure performance standards, per rule 19.15.36.15.F NMAC:

- Benzene as determined by EPA SW-846 method 8021B or 8260B, shall not exceed 0.2 mg/kg.
- Total BTEX as determined by EPA SW-846 method 8021B or 8260B, shall not exceed 50 mg/kg.
- The GRO and DRO combined fractions as determined by EPA SW-846 method 8015M shall not exceed 500 mg/kg.
- TPH as determined by EPA method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg.
- Chlorides as determined by EPA method 300.1, shall not exceed 500 mg/kg since the depth to ground water is from 55-75 feet according to document General Correspondence Years 1992-1989 starting at page 104.
- The concentration of constituents listed in Subsections A and B of 20.6.2.3103 NMAC shall be determined by EPA SW-846 methods 6010B or 6020 or other methods approved by the division. If the concentration of those constituents exceeds the PQL or background concentration (Exhibit #2), the operator shall either perform a site specific risk assessment using EPA approved methods and shall propose closure standards based upon individual site conditions that protect the fresh water, public health, safety and the environment, which shall be subject to division approval or remove pursuant to Paragraph (2) of Subsection G of 19.15.36.15 NMAC and Section A5 for waste disposal, for disposal at San Juan Landfill with division's approval per rule 19.15.35.8.C.3.c NMAC.

b. Compliance with the closure performance standards will be demonstrated by collecting and analyzing a minimum of one (1) composite soil sample, consisting of four (4) discrete samples, per rule 19.15.36.15.F NMAC, until it has demonstrated by monitoring the treatment zone at least semi-annually that the contaminated soil has been treated to the standards specified in Subsection F of 19.15.36.15 NMAC per rule 19.15.36.15.D NMAC (therefore, two subsequent samples being six (6) months apart showing the remediated soils at the standards described above will show compliance and release the landfarm to be re-contoured).

7. Soil Re-vegetation or Removal:
    i. Soils remediated to the standard in Section H6.ii. above and left in place are re-vegetated as outlined in Section J, per rule 19.15.36.15.D.4.b NMAC.
    ii. If treated soils are removed (according to A5 procedure), the cell is filled in with native soil and re-vegetated as outlined in Section J3 and J4.
    iii. Soil that has not been or cannot be remediated to the standards in Section H6.ii. are removed to a division approved surface waste management facility according to A5 procedures and for disposal at San Juan Landfill with division's approval per rule 19.15.35.8.C.3.c NMAC, and the cells are filled in with native soil and re-vegetated as outlined in Section J3 and J4, per rule 19.15.36.18.D.4.c NMAC.
8. Rule 19.15.36.18.D.4.f NMAC: Any remaining buildings, fences, roads, and equipment associated with the land farm will be removed. The site will be cleaned up of any associated debris or equipment and any needed soil tests (including but not limited to stained spots and releases during operation) around the landfarm will be taken as situation requires, per rule 19.15.36.18.D.4.f NMAC. Soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B.
9. Berms will be removed and utilized in the re-contouring of the site, per rule 19.15.36.18.D.4.e NMAC.
10. Backfill: The area will be backfilled as outlined in Section I.
11. Closure Report: Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

I. Reclamation
1. Backfill the site with clean dirt from the location and/or clean dirt brought in.
2. Grading will be sloped to promote proper storm water drainage and to prevent ponding if minor settling occurs. Exhibit #4 is a contour map to aid in proper grading.
3. Drainage at the site is primarily by sheet flow to the north. The site is relatively flat with drainage to the west from the south end of the facility and to the north from the north end of the facility.
4. Wattles will be placed on the slopes along with straw mulching, see Exhibit #6.
5. If significant erosion begins to occur, OCD's approval will be acquired to implement structural, vegetative, and/or stabilization BMP's to limit erosion and will be included in the final closure report.
6. If it becomes necessary, OCD's approval will be acquired to install sediment control structures, where needed, to slow or redirect the runoff and trap sediment.

J. Post Closure

1. Closure Report:
    i. At the completion of the closure activities a closure report will be submitted to the Santa Fe office that summarizes the completed activities , including but not limited to:
        a. Identification of an material disposed of
        b. Sampling results
        c. Backfilling and contouring activities
        d. Contour map
        e. Re-vegetation seeding mixture and application rates
        f. Photo documentation
        g. Applicable final determination from District Office resulting from A4 actions
    ii. The report will include closure activities from the closure of the Unlined Pond in 2012.
2. Care Period: The post closure care period for a landfarm, pond, or pit will be three (3) years once Agua Moss has achieved clean closure. During that period Agua Moss, or other responsible entity will regularly inspect on a quarterly basis and maintain required re-vegetation. If there has been a release to the vadose zone or to ground water, Agua Moss or other responsible entity will comply the A4 spill and release procedures.
3. Re-Vegetation: Areas at the site to be re-vegetated are presented in Exhibit #5. Re-vegetation will consist of establishment of a vegetative cover equal to 70 percent of the native perennial vegetative cover (un-impacted by overgrazing, fire, or other intrusion damaging to native vegetation) or scientifically documented ecological description consisting of at least three native plant species, including at least one grass, but not including noxious weeds, per rule 19.15.36.18.A.6 NMAC.
    i. The vegetative cover will be maintained through two successive growing seasons, per rule 19.15.36.18.A.6 NMAC.
4. Release of Financial Assurance: per rule 19.15.36.18.B NMAC.
    i. The division shall inspect the site to determine that closure is complete.
    ii. Once complete, financial assurance will be released, less the amount needed for post closure activities.
    iii. After the applicable post closure care period, three years, has expired the division will release the remainder of the financial assurance if the re-vegetation, in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC, is successful.
        a. If contamination is revealed during the surface waste management facility's operation or in the applicable post closure care period following the surface waste management facility's closure the division will not release the financial assurance until the contamination is remediated in accordance with 19.15.30 NMAC and 19.15.29 NMAC, as applicable.

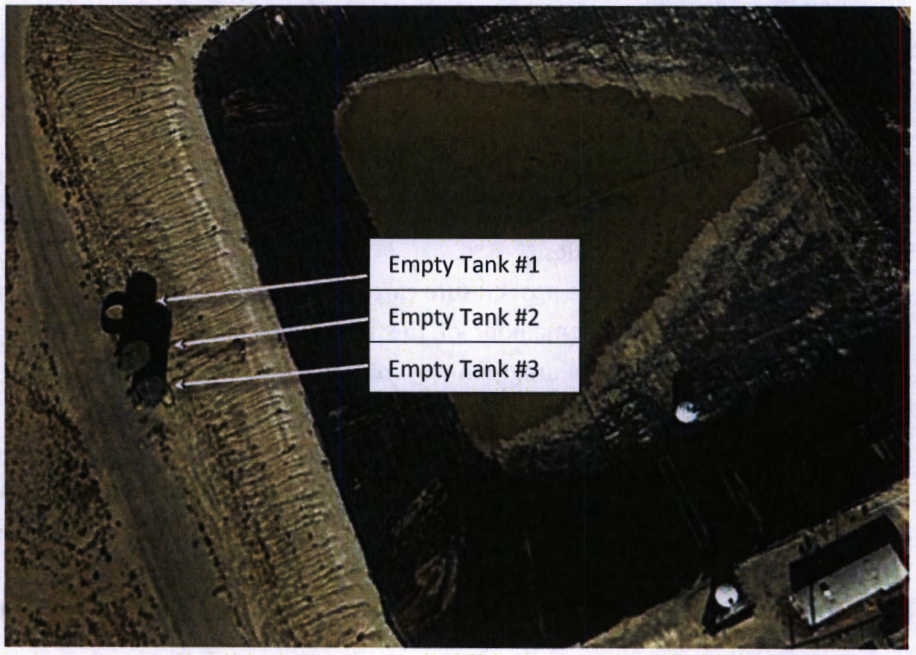
Exhibit #1

Equipment Descriptions

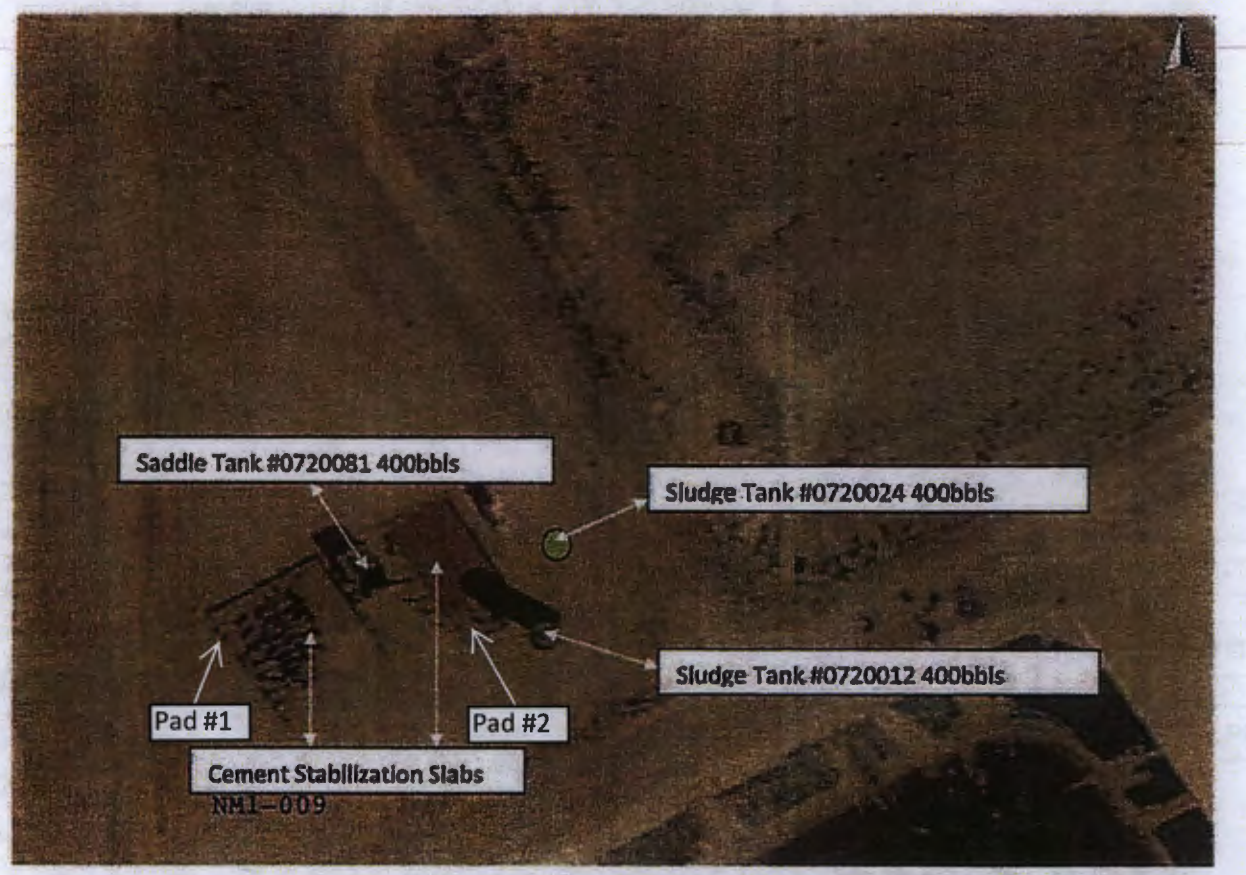
Cleaned and Stored:

1. #1 Steel Pit (Shale Shaker attached) 498 bbls (8' x 10' x 35')
2. #2 Steel Pit 636 bbls
3. #3 Steel Pit 463 bbls
4. Steel Sludge Pit 460 bbls
5. Steel Shale Shaker Below Grade Tank #0920061 15 bbls
6. Storage Tank #0920049 400 bbls
7. Storage Tank #0920051 300 bbls
8. Storage Tank #0920052 300 bbls
9. Storage Tank #0920053 300 bbls
10. Sludge Tank #1 #0720024 400 bbls (West End)
11. Sludge Tank #2 #0720012 400 bbls (West End)
12. Saddle Tank #0720081 400 bbls (West End)
13. Chlorine Storage Tanks 2600 gallons
14. Separator
15. Empty Tank #1 400 bbls (West side of pond)
16. Empty Tank #2 400 bbls (West side of pond)
17. Empty Tank #3 400 bbls (West side of pond)

Images of the equipment are below and on the following pages.



West End of Location: Detailed Diagram of soil Mixing Containments



This part of the facility is not in use.

Exhibit #1
Diagram #1

South End of Location (NM1-9): Detailed diagram

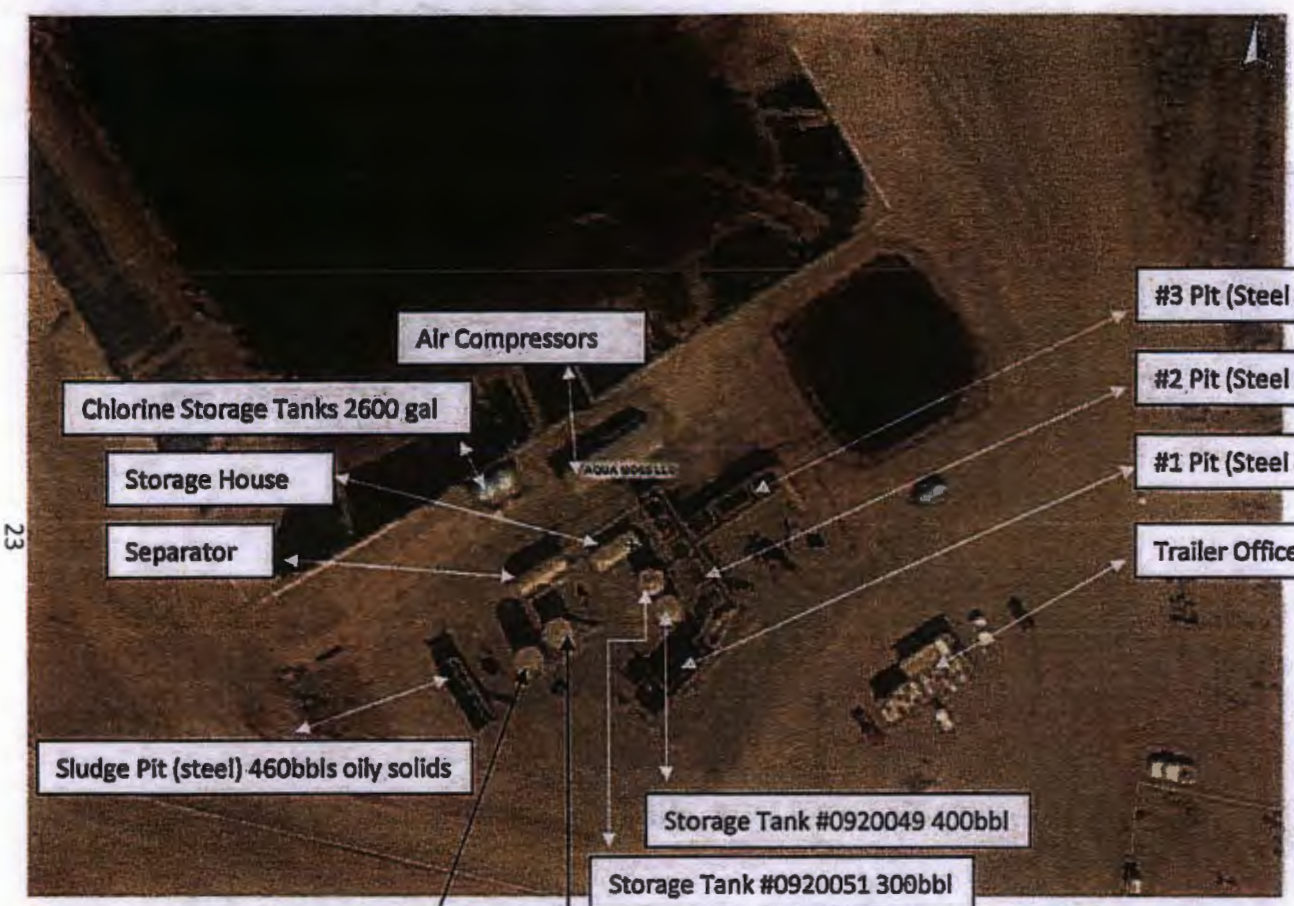


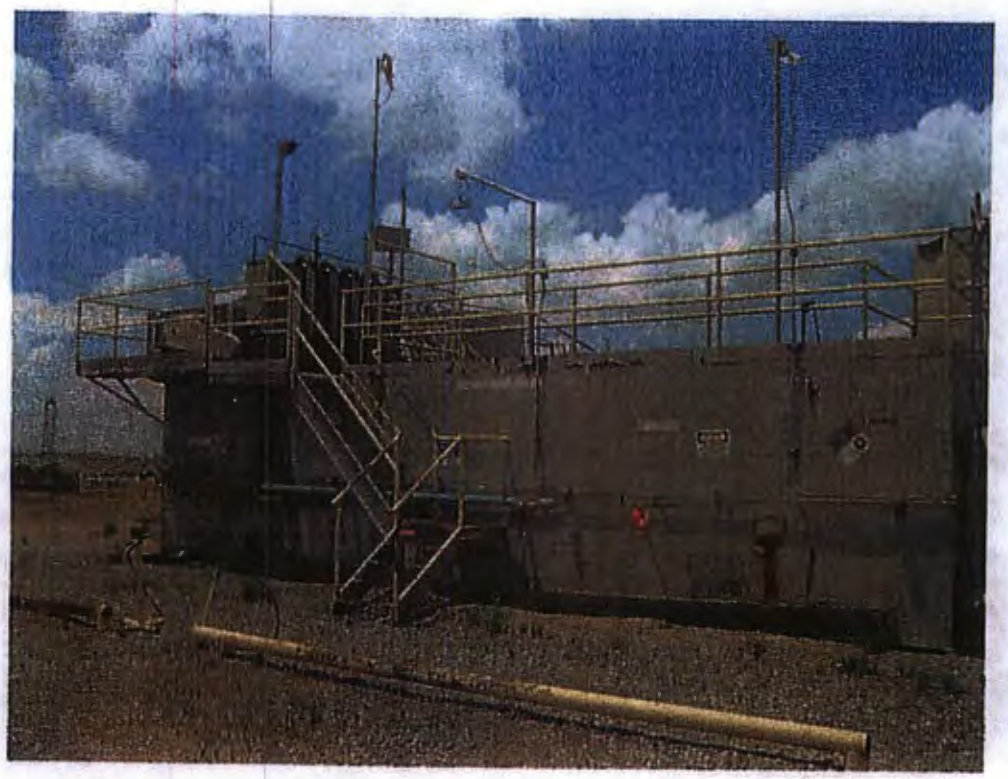
Exhibit #1
Diagram #2

Exhibit #1
Images

Steel Pit #3

Steel Pit #2

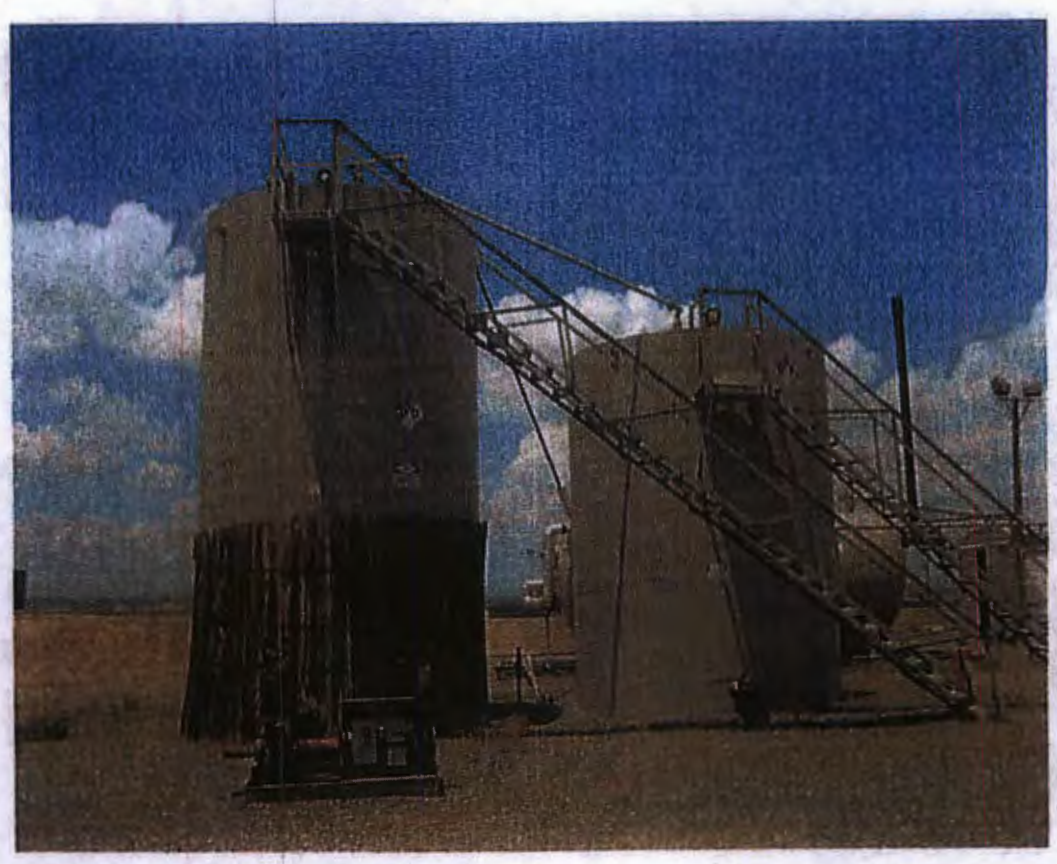
Steel Pit #1 (Shaker)



Steel Sludge Pit

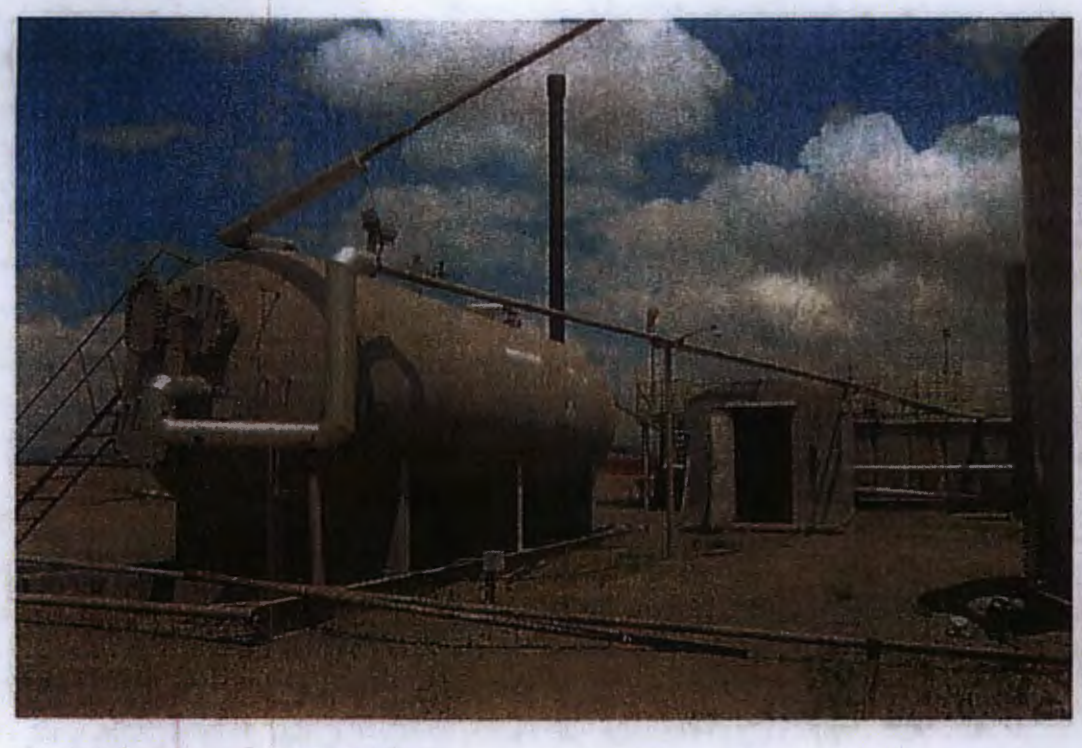

26
CONFINED SPACE

Oil Storage tanks (#0920053 & 0920052)



Storage Tanks (#0920049 & 0920051)

Separator & Storage House



Chlorine Tanks & Air Compressor Shed

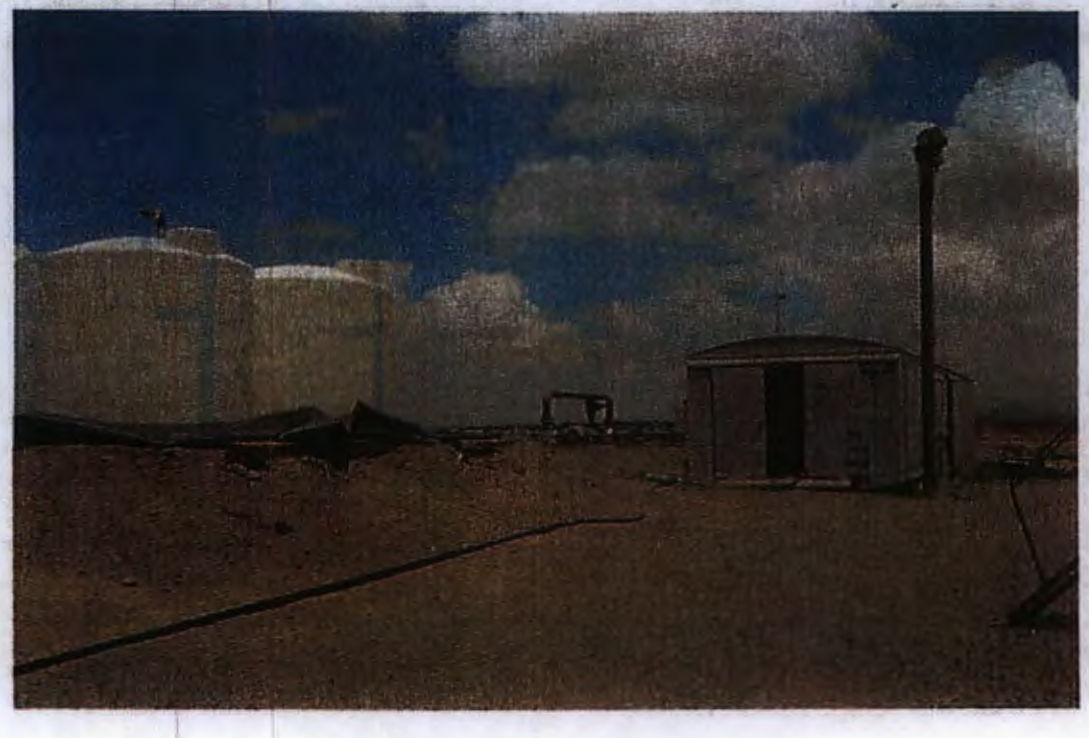


Exhibit #2
Soil Background Concentration

*The following Soil Background Concentration table is currently being updated. Two (2) composite soil samples, testing for the missing constituents in the following table, were taken on May 20, 2015. The analyzed analytical results from the May 20, 2015 sampling will be added to the following table. Once all sampling has been combined and analyzed, it will be sent to the NMOCD for approval. The approved background will be used as the referenced "Exhibit #2 Soil Background Concentration", replacing the following table.

Analyzed Background Soil Concentration

Sample Date:	Sept. 17, 2012								Non-Detect Sub.				
Parameter	SE Corner	NW Corner		Conversion ug/kg to mg/kg	Det. Limit		Conversion ug/kg to mg/kg		SE Corner	NW Corner	Mean		Adjusted Facility Background
Gasoline Range (C5-C10)	ND	ND	(mg/kg)		0.2	(mg/kg)			0.1	0.1	0.1	(mg/kg)	0.2 (mg/kg)
Diesel Range (C10-C28)	ND	ND	(mg/kg)		0.1	(mg/kg)			0.05	0.05	0.05	(mg/kg)	0.1 (mg/kg)
TPH (Method 8015B)	ND	ND			0.3				0.15	0.15	0.15	(mg/kg)	0.3 (mg/kg)
Benzene	ND	ND	(ug/kg)		10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	0.01 (mg/kg)
Toluene	ND	ND	(ug/kg)		10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	0.01 (mg/kg)
Ethylbenzene	ND	ND	(ug/kg)		10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	0.01 (mg/kg)
p,m-Xylene	ND	13.6	(ug/kg)	0.0136 (mg/kg)	10	(ug/kg)	0.01	(mg/kg)	0.005	0.0136	0.0093	(mg/kg)	0.01 (mg/kg)
o-Xylene	ND	ND	(ug/kg)		10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	0.01 (mg/kg)
Total BTEX	ND	13.6		0.0136 (mg/kg)	50	(ug/kg)	0.05	(mg/kg)	0.025	0.0336	0.0293	(mg/kg)	0.05 (mg/kg)
pH	7.78	7.69	(s.u.)						7.78	7.69	7.735	(s.u.)	7.735 (s.u.)
Conductivity @ 25°C	476	368	(umhos/cm)						476	368	422	(umhos/cm)	422 (umhos/cm)
Total Dissolved Solids @ 180C	332	288	(mg/L)						332	288	310	(mg/L)	310 (mg/L)
SAR	1.50	0.400							1.50	0.400	0.95		0.95
Total Alkalinity as CaCO3	98.0	87.0	(mg/L)						98.0	87.0	92.5	(mg/L)	92.5 (mg/L)
Total Hardness as CaCO3	124	121	(mg/L)						124	121	122.5	(mg/L)	122.5 (mg/L)
Bicarbonate as CaCO3	98.0	87.0	(mg/L)		0.01	(mg/L)			98.0	87.0	92.5	(mg/L)	92.5 (mg/L)
Carbonate as CaCO3	<0.01	<0.01	(mg/L)		0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	0.01 (mg/L)
Hydroxide as CaCO3	<0.01	<0.01	(mg/L)		0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	0.01 (mg/L)
Nitrate Nitrogen	21.6	23.0	(mg/L)		0.01	(mg/L)			21.6	23.0	22.3	(mg/L)	22.3 (mg/L)
Nitrite Nitrogen	<0.01	<0.01	(mg/L)		0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	0.01 (mg/L)
Chloride	38.2	40.1	(mg/L)		0.01	(mg/L)			38.2	40.1	39.15	(mg/L)	39.15 (mg/L)
Fluoride	2.01	<0.01	(mg/L)		0.01	(mg/L)			2.01	0.01	1.0075	(mg/L)	1.0075 (mg/L)
Phosphate	<0.01	3.40	(mg/L)		0.01	(mg/L)			0.005	3.40	1.7025	(mg/L)	1.7025 (mg/L)
Sulfate	247	34.6	(mg/L)		0.01	(mg/L)			247	34.6	140.8	(mg/L)	140.8 (mg/L)
Iron	<0.01	<0.01	(mg/L)		0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	0.01 (mg/L)
Calcium	36.5	37.9	(mg/L)		0.01	(mg/L)			36.5	37.9	37.2	(mg/L)	37.2 (mg/L)
Magnesium	7.90	6.52	(mg/L)		0.01	(mg/L)			7.90	6.52	7.21	(mg/L)	7.21 (mg/L)
Potassium	3.68	12.9	(mg/L)		0.01	(mg/L)			3.68	12.9	8.29	(mg/L)	8.29 (mg/L)
Sodium	39.4	10.8	(mg/L)		0.01	(mg/L)			39.4	10.8	25.1	(mg/L)	25.1 (mg/L)
Cyanide (total)	0.004	0.002	(mg/L)						0.004	0.002	0.003	(mg/L)	0.003 (mg/L)
Arsenic	4.16	3.65	(mg/kg)		0.01	(mg/kg)			4.16	3.65	3.905	(mg/kg)	3.905 (mg/kg)
Barium	231	318	(mg/kg)		0.01	(mg/kg)			231	318	274.5	(mg/kg)	274.5 (mg/kg)
Cadmium	0.49	0.66	(mg/kg)		0.01	(mg/kg)			0.49	0.66	0.575	(mg/kg)	0.575 (mg/kg)
Chromium	8.63	9.25	(mg/kg)		0.01	(mg/kg)			8.63	9.25	8.94	(mg/kg)	8.94 (mg/kg)
Copper	6.68	14.0	(mg/kg)		0.01	(mg/kg)			6.68	14.0	10.34	(mg/kg)	10.34 (mg/kg)
Lead	11.8	22.3	(mg/kg)		0.01	(mg/kg)			11.8	22.3	17.05	(mg/kg)	17.05 (mg/kg)
Mercury	0.41	0.22	(mg/kg)		0.01	(mg/kg)			0.41	0.22	0.315	(mg/kg)	0.315 (mg/kg)
Manganese	218	298	(mg/kg)		0.01	(mg/kg)			218	298	258	(mg/kg)	258 (mg/kg)
Selenium	0.46	0.73	(mg/kg)		0.01	(mg/kg)			0.46	0.73	0.595	(mg/kg)	0.595 (mg/kg)
Silver	ND	0.50	(mg/kg)		0.01	(mg/kg)			0.005	0.50	0.2525	(mg/kg)	0.2525 (mg/kg)
Zinc	21.9	54.9	(mg/kg)		0.01	(mg/kg)			21.9	54.9	38.4	(mg/kg)	38.4 (mg/kg)
Sample Date:	May 20, 2015												
TPH (Method 418.1)													
Uranium													
Polychlorinated Biphenyls													
Carbon Tetrachloride													
1,2-dichloroethane													
1,1-dichloroethylene													
1,1,2,2-tetrachloroethylene													
1,1,2-trichloroethylene													
Methylene Chloride													
Chloroform													
1,1-dichloroethane													
Ethylene Dibromide													
1,1,1-trichloroethane													
1,1,2-trichloroethane													
1,1,2,2-tetrachloroethane													
Vinyl Chloride													
Benzo-a-pyrene													
Phenols													
PAHs: total naphthalene plus monomethylnaphthalenes													
Radioactivity: Combined Radium-226 & Radium-228													

Table will be updated, waiting on

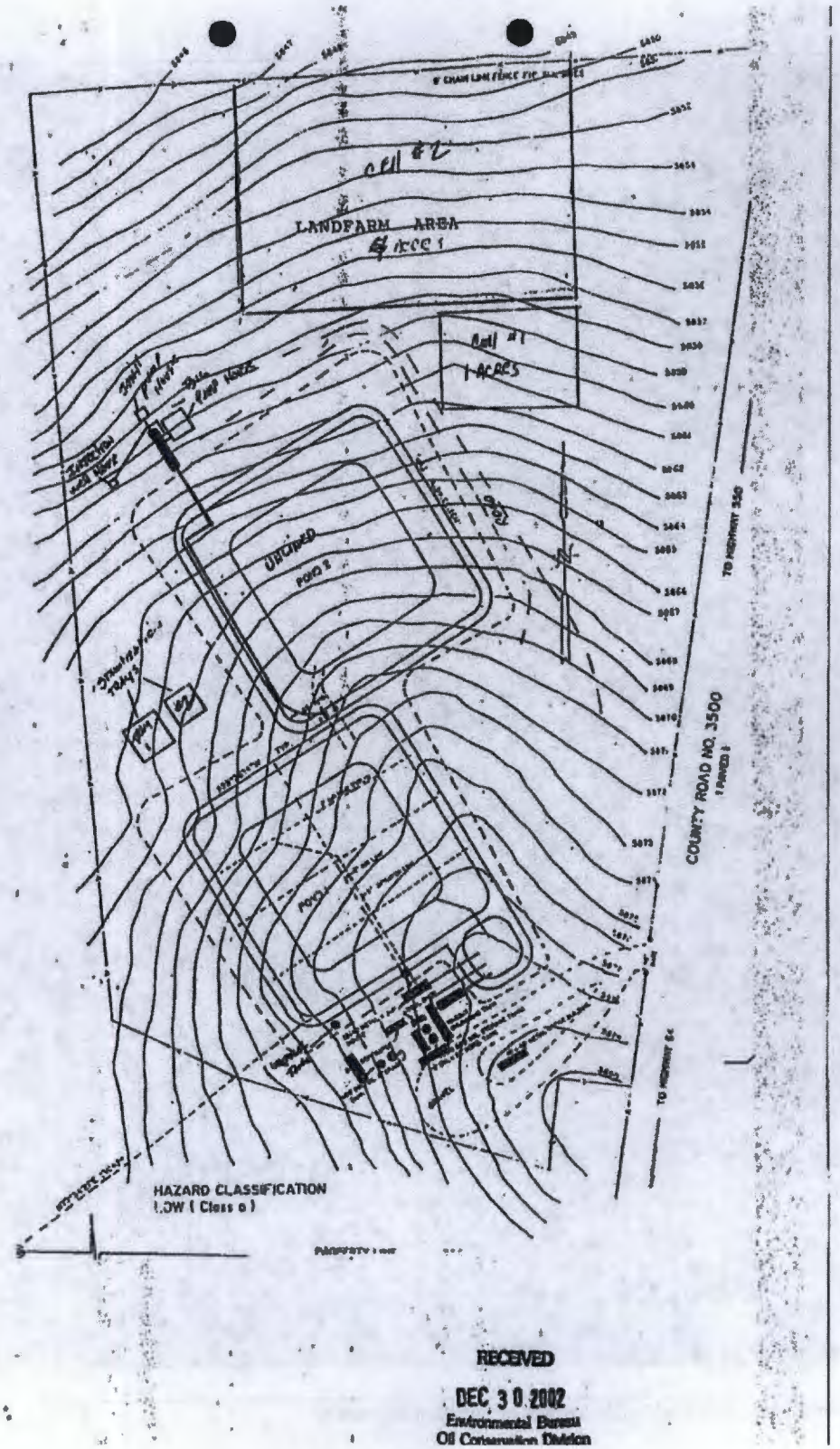
*For ND and < values, 1/2 the Det. Limit was used as substitution method.

Exhibit #3

Facility Picture

Exhibit #4

Contour Map



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Environmental Bureau
Oil Conservation Division

Exhibit #5

Re-vegetation Map

Sunco Class I Facility UICI-005 & NM1-009 Surface reclamation/vegetation

Exhibit #6

Wattle Description

Straw Wattle

Erosion control and Sediment Retention Wattles (ESW) or Slope Interruption Devices (SID) commonly known as Wattles, are elongated tubes of compacted straw and/or other fibers that are installed along contours or at the base of slopes to help reduce soil erosion and retain sediment. They function by shortening slope length, reducing runoff water velocity, trapping dislodged soil particles and ameliorating the effects of slope steepness. Wattles are used as water flow dissipaters, trapping sediment when located prior to Drain Inlets (D.I.) etc. Wattles are highly effective when they are used in combination with other surface soil erosion/re-vegetation practices such as surface roughening, straw mulching, erosion control blankets, hydraulic mulching and application of bonded fiber matrix or other hydraulic soil stabilizers.

Jones, Brad A., EMNRD

From: Shacie Murray <shacie@merrion.bz>
Sent: Monday, June 01, 2015 4:39 PM
To: Jones, Brad A., EMNRD
Cc: Ryan Davis; Philana Thompson; Griswold, Jim, EMNRD
Subject: Re: Official Submission of NM1-9-0 Closure Plan

Please disregard the previous (dated May 28, 2015) official submission and hard copy submission being delivered in the mail.

Following up from phone conversation on June 1, 2015 at 2:35 pm with Brad Jones.

It was pointed out that the Steel Shale Shaker Sump is miss labeled and should be identified as a below grade sump. A below grade sump needs special closure attention: removal, potential leak detection removal, and soil sampling needs addressed. This issue will be fixed and a new plan will be submitted with the current date. A signed, Agua Moss cover letter will be scanned with the revised closure plan and emailed/uploaded to FTP site. The email with attachments will suffice as the official submission and a hard copy will not be needed.

I am sorry for any inconvenience this has caused.

Shacie Murray

Merrion Oil & Gas
Operations Department
(505) 324-5324
shacie@merrion.bz

On Thu, May 28, 2015 at 3:13 PM, Shacie Murray <shacie@merrion.bz> wrote:
Brad,

It is my pleasure to submit the closure plan for permit NM1-9-0 to the OCD for approval. The plan is attached and also uploaded to the FPT site, filezilla under NM9 then NM1-9 closure drafts, document dated 2015-05-28.

Thank you for your time and assistance getting us to this point. Agua Moss is eager and ready to start closure as soon as the plan is approved.

Shacie Murray

Merrion Oil & Gas
Operations Department
(505) 324-5324

shacie@merrion.bz

Agua Moss

May 28, 2015

Cert. Mail # 7008-1140-0004-7853-8017

Mr. Brad Jones
Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Permit NM1-9-0
Closure Plan

Mr. Jones,

Please find attached closure plan for Agua Moss Surface Waste Facility, permit NM1-9-0. The closure plan submission is for division approval.

Thank you for your patients and assistance in this matter. If you have any questions or concerns please contact me at shacie@merrion.bz or 505-324-5324.

Sincerely,

Agua Moss

RECEIVED OCD
2015 JUN -4 P 3:05

Shacie Murray
Operations Department
shacie@merrion.bz

cc: Jim Griswold

Closure Plan

Permit NM1-9-0

Agua Moss, LLC

PO Box 600

Farmington, NM 87499

Surface Waste Management Facility

SWNW S2, T29N, R12W

San Juan County, New Mexico

May 28, 2015

The majority of the Sunco property is bare ground. Trucks enter the facility from County Road 3500. No new material has been accepted to the below areas since transfer of ownership effective February 2012.

NM1-9-0 applies to the following:

1. Lined Evaporation Pond
2. Lined Skimmer Pit
3. Un-loading Facility
4. Cement Stabilization Pads
5. Landfarm

Action and Estimated Schedule

The closure plan will begin within 5 days of NMOCD approval. Landfarm closure schedule will be dependent on soil remediation but not to exceed 5 years.

1. (2 day) Preparation: Clean 2 pits, move 6 tanks, test soil, set trucks and trailers. Section B.
2. (2 days) Cement Stabilization Pads: Breakup and hauling of cement. Leak detection system soil sampling. Section C.
3. (2 days) Chlorine Storage Tanks and Air Compressors: Clean, inventory, removing liner, soil sampling. Section D.
4. (4 days) Evaporation Pond: Liner removal, leak detection system soil sampling. Section E.
5. (2 days) Cement Stabilization Pads: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system, soil sampling. Section C.
6. (2 days) Chlorine Storage Tanks and Air Compressors: Soil sampling results, removal of berms. Section D.
7. (2 days) Skimmer Pit: Removal of fencing, netting, and liner. Leak detection system soil sampling. Section F.
8. (10 days) Evaporation Pond: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system piping, sump, connecting pipe, secondary liner and geotextile liner, soil sampling. Section E.
9. (2 Days) Equipment: Removal of piping, NORM testing. Section G.
10. (7 days) Skimmer Pit: Leak detection system soil sampling results, placing soil for disposal, removal of leak detection system piping, sump, secondary liner and geotextile liner, and soil sampling. Section F.
11. (5 Days) Equipment: Clean, inventory, and soil sampling. Section G.
12. (1 Day) Clean End Dump Trailers and release. Section B.
13. (20 days) Dirt work of southern half of facility. Section I.
14. (1 year) Landfarm closure. Section H.
15. (20 days) Dirt work of north half of facility. Section I.
16. (30 days) Final closure report and re-vegetation. Section J.

Table of Contents

Table of Exhibits

19.15.36.18 CLOSURE AND POST CLOSURE PLAN FOR NM1-9-0

Surface Waste Management Facility Closure Procedures

A. General:

1. No Acceptance: No new material has been accepted to the un-loading facility, cement stabilization pads, evaporation pond, skimmer pit, or landfarm by Agua Moss, LLC since change of ownership effective February 2012.
2. During Closure Operations: Agua Moss will maintain the surface waste management facility to protect fresh water, public health and the environment, and will continue to adhere to permit requirements.
3. Records: Agua Moss will maintain records, for a period of not less than five years after the commercial facility's closure, reflecting the generator, the location of origin, the location of disposal within the commercial facility, the volume and type of oil field waste, the date of disposal and the hauling company for each load or category of oil field waste accepted at the commercial facility.
4. Spill or Release Protocol: In the event of a spill or release, Agua Moss will adhere to rule(s) 19.15.29 and/or 19.15.30 NMAC as appropriate. Release remediation will be demonstrated with the Aztec district office. The analyzed sample results and OCD's District Office confirmation of clean up or no further action determination will be sent to the Santa Fe state office in the closure report.
5. Waste Disposal: Tanks, equipment, cement stabilization pads used for oil treatment, pond, skimmer pit, and leak detection systems will be cleaned and BSW (Basic Sediment and Water) waste will be disposed of, as will soils from leak detection, soil below equipment, pond, pit, and pads, and soil from the landfarm as follows:
    i. Solids and Sludge:
        a. Envirotech Landfarm permit #NM-01-0011 or JFJ Landfarm permit #NM1-010-B, within all of the facilities permitted limits including the chloride limit of 1,000 mg/kg for Envirotech and 500 mg/kg for JFJ.
            - All waste, to and from all facilities, will be manifested with the submission of a C-138 form.
        b. San Juan County Landfill permit #241102 operated by Waste Management, with waste release approval from OCD Santa Fe division when applicable, per rule 19.15.35.8 NMAC, and WM requirements.
        c. Bondad Landfill permit #C.R.S. & 30-20-112 operated by WCA, Durango, CO.
    ii. Liquids
        a. All waste, to and from all facilities, will be manifested with the submission of a C-138 form.
        b. All transportation, to and from all facilities, of liquid waste will only be handled by certified haulers that have an approved C-133, a monthly

updated list of approved drivers can be found on OCD online at, http://www.emnrd.state.nm.us/OCD/statistics.html

c. All waste will be injected into the Class I, Sunco Disposal Well, permit # UICI-5-0, according to UICI-5 permit conditions and disposal of produced water, per rule 19.15.34.11 NMAC.

6. Equipment Cleaning: Cleaning of the equipment will be completed with a pressure washer, steam cleaner, and hydrovac process, in conjunction with IEI (Industrial Ecosystems Inc.).
   i. By utilizing the hydrovac process; the solids, liquids and/or sludge are vacuumed into a tank, transported to IEI facility, #49 CR 3150 Aztec, NM 87410, and centrifuged, following A5 procedures.
   ii. After being centrifuged, solids and liquids separate, the liquids will be transported back to the Sunco Disposal #1 for injection according to A5 procedures and the solids will be disposed of according to A5 procedures.

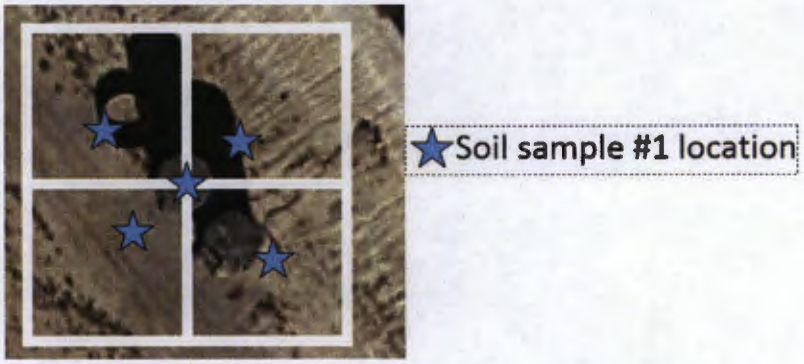
7. Testing for NORM, per rule 20.3.14 NMAC:
   i. If NORM levels are **above** the following according to rule 20.3.14.1403 NMAC:
      a. In soil, 30 picocuries/gram above background (Exhibit #2) of radium 226, or 150 picocuries/gram above background (Exhibit #2) in 15 cm layers, averaged over 100 square meters of any other NORM radionuclide.
         - Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.
      b. Accessible point for equipment, 50 mR/hr, including background radiation levels.
         - Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.
      c. Sludges and scales, within 1 cm of surface, 50 mR/hr, including background radiation levels (if over but a representative sample shows Radium 226 is less than 30 picocuries/gram material is exempt).

- Contact New Mexico Environment Department, Radiation Specialist, Edward Vigil, 505-222-9517, 505-280-2790, or Edward.vigil1@state.nm.us for further instructions.

ii. If NORM levels are acceptable, proceed with closure as outlined.

B. Preparation

1. Clean the Sludge Pit and Steel Pit #2 (see Exhibit #1 for detailed description) according to A6 procedures. Cleaning is all self-contained. All waste will be captured inside of the pits and properly disposed of according to A5 procedures. In the event of a spill or release A4 procedures will be followed.
    i. The Sludge Pit is now ready to hold material awaiting NORM testing.
    ii. Steel Pit #2 is now ready to be a containment for cleaning of materials.
2. The Saddle Tank, Sludge Tank #1, Sludge Tank #2, Empty Tank #1, Empty Tank #2, and Empty Tank #3 (see Exhibit #1 for detailed description) will be relocated to the south end of the facility with the other equipment. The tanks will be NORM tested and cleaned later in closure as described in Section G.
3. The site under the Saddle Tank, Sludge Tank #1, and Sludge Tank #2 will be sampled along with the site under both cement stabilization pads as described in Section C.
4. The site under the Empty Tank #1, Empty Tank #2, and Empty Tank #3 will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples, as purposed below.



i. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.

ii. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
iii. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

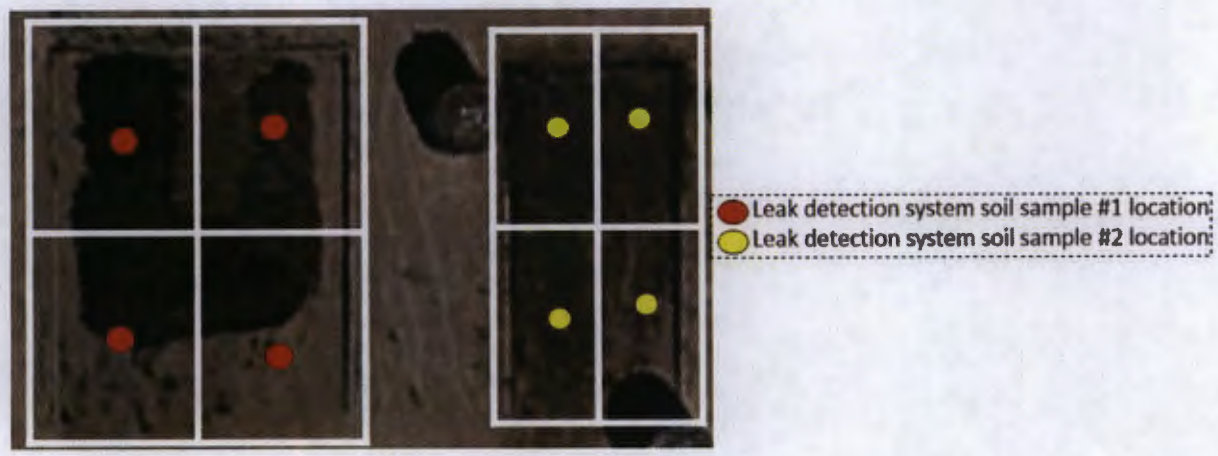
5. End Dump Trailers: Set up three (3) end dump trailers on location to hold and haul soil according to A5 procedures. Clearly mark the constituents allowed for the destination of the truck as follows (i. – iii.).
    - After all of the contaminated soil has been removed (not including soil from the landfarm) all of the end dump trailers will be cleaned according to A6 procedures (cleaning is self-contained), in the event of a spill or release A4 procedures will be followed, and the trailers will be released.

    i. The first trailer destination to Envirotech Landfarm:
        a. Chlorides cannot exceed 1,000 ppm
        b. At least 100 ppm of hydrocarbons
    ii. The second trailer destination to San Juan Landfill:
        a. Chlorides exceeding 1,000 ppm
        b. No TPH
        c. Must have division's approval per rule 19.15.35.8.C.3.c NMAC.
        d. Contact Barbara Pinkerton at bpinkert@wm.com or 480-457-4795 at Waste Management for further constituent questions and additional testing requirements.
    iii. The third trailer destination to Bondad Landfill:
        a. Soil that does not meet San Juan Landfill or Envirotech standards
        b. Contact Chantell Griffith at cgriffith@wcamerica.com for constituent questions.
6. Transportation Truck: Have a truck on site to hold and haul liners according to A5 procedures.

C. Cement Stabilization Pads

1. The cement of both pads will be broke into manageable pieces (3' by 3' per Bondad Landfill requirements) with a backhoe and placed onto a truck to be hauled to Bondad Landfill according to A5 procedures.
2. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4)

discrete samples under each pad, as purposed below. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.



   i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.
   ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.
3. The leak detection system piping for both pads will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
4. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
5. The leak detection system liner for both pads will be removed in manageable pieces, cleaned in Steel Pit #2 and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will <u>not</u> need OCD approval).
6. The removal equipment will be cleaned as needed over Steel Pit #2, so that all wastewater and overspray will be contained in the pit.
7. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
8. The site under both cement stabilization pads, the Saddle Tank, and both Sludge Tanks will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples under Pad #1, one (1) composite sample consisting of five (5) discrete samples in each grid quadrant of the grid overlying Pad #2, the Saddle Tank and both Sludge Tanks, as purposed below.

9. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.
10. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
11. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

D. Empty Chlorine Storage Tanks and Air Compressors

1. The chlorine tanks are empty and there are no lids or caps on the tanks.
2. Clean the empty chlorine storage tanks according to A6 and A5 procedures. Cleaning is self-contained within the tank. If a spill or release occurs A4 procedures will be followed.
3. Place tanks in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
4. Remove 8" PVC in manageable pieces, clean in Steel Pit #2, and place in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j.
5. Remove liner in manageable pieces, clean in Steel Pit #2, and load on truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will <u>not</u> need OCD approval).
6. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
7. Place air compressors and air compressor building in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
8. The soil under the chlorine storage tanks and air compressor building will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test

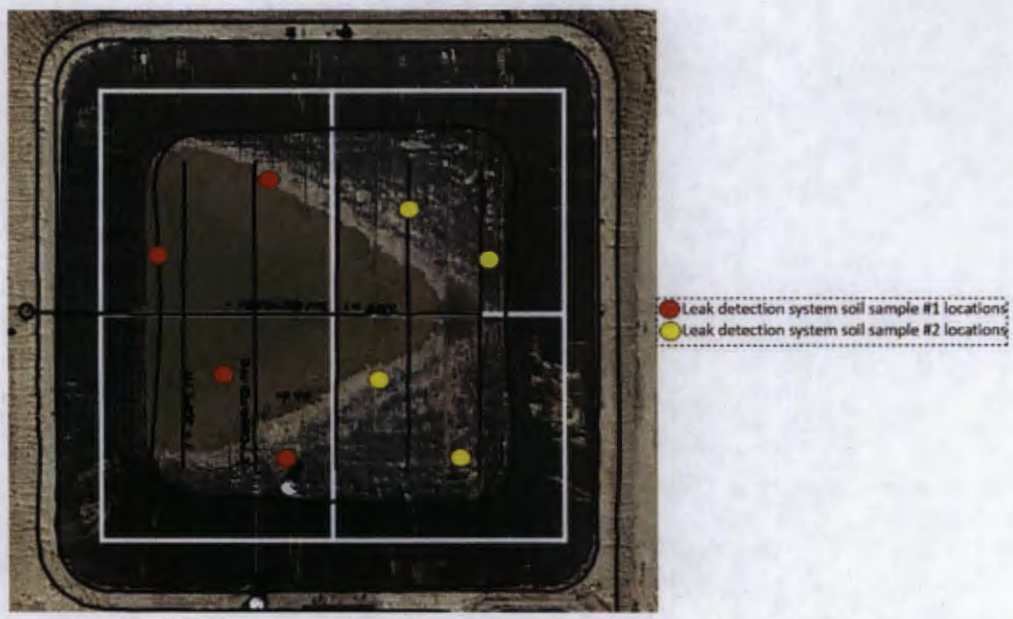
methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least two (2) composite samples consisting of four (4) discrete samples, as purposed below.

9. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 spill and release procedures will be followed.
10. Berms will be removed and utilized in the re-contouring of the site.
11. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
12. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

E. Evaporation Pond

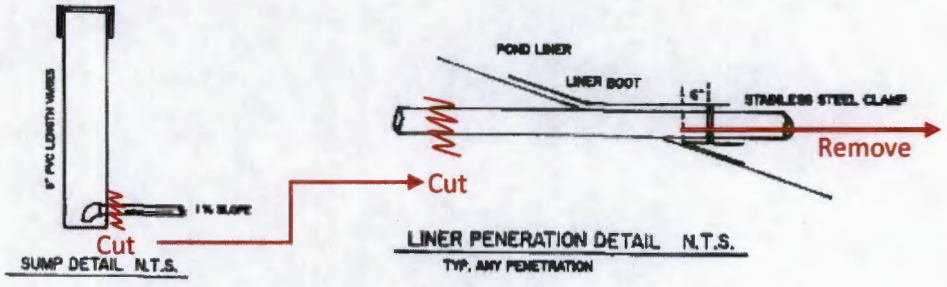
1. There is no liquid, solid, or sludge accumulation in the Evaporation Pond. In the event that liquid, solid, or sludge accumulation is discovered it will be removed by a vac-truck according A5 procedures.
2. In the event of a spill or release A4 procedures will be followed.
3. The liner of the Evaporation Pond will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will <u>not</u> need OCD approval).
4. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least two (2) composite samples consisting of four (4) random samples, as purposed below. If leak

detection system soil is found on the interior slope of the pond, then additional samples will be taken to ensure all soil is equally represented. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.

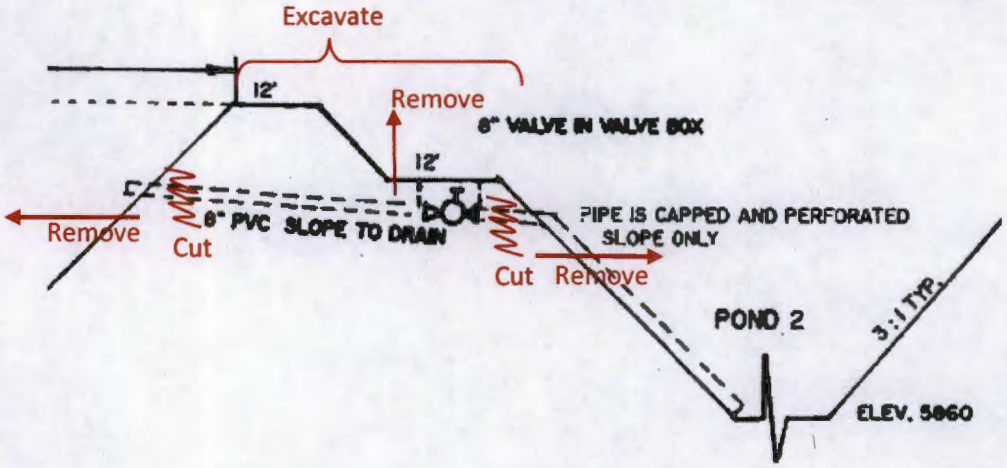


i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.
ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

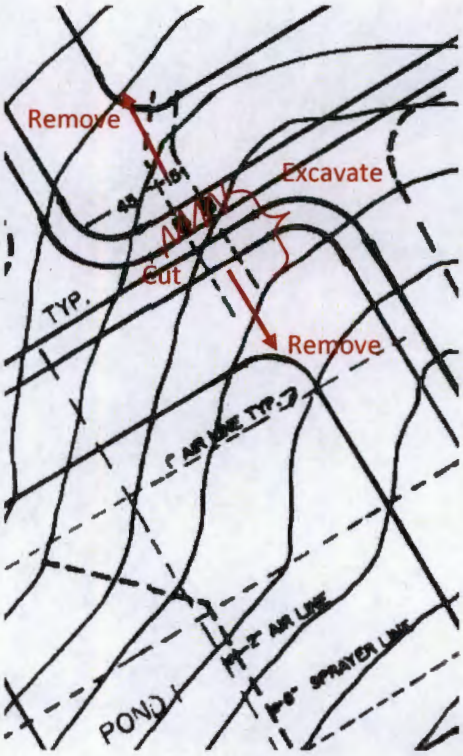
5. The leak detection system piping will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
6. The sump, shown below, will be excavated. The pipe will be cut and pulled through on the pond side, shown below. The Sump, piping, and clamp will be removed, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



7. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedures.
8. The pipe and valve connecting the Skimmer Pit and Evaporation Pond will be excavated and removed as shown below, cleaned in Steel Pit #2, and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



9. The two pipes installed through the Evaporation Pond liner as overflow into the unlined pond will be excavated and removed as shown below, cleaned in Steel Pit #2, and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



10. Any remaining debris will be removed from the secondary liner via vac-truck and pressure washer according to A5 procedure. The secondary liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
11. The geotextile liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
12. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 procedure.
13. The site under the Evaporation Pond will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of four (4) discrete samples in the sump system, with one discrete sample being at the point where the sump piping intersects the leak detection liner, one (1) composite sample consisting of four (4) discrete samples in the overflow piping area, with one discrete sample being at the point where each of the pipes intersect the leak detection liner, one (1) composite sample consisting of five (5) discrete samples in each of the four (4) grids, and one (1) composite sample consisting of three (3) discrete samples in the area where the pipe connecting the pit and pond was removed, with one discrete sample being at the point where the pipe intersects the leak detection liner, as purposed below.

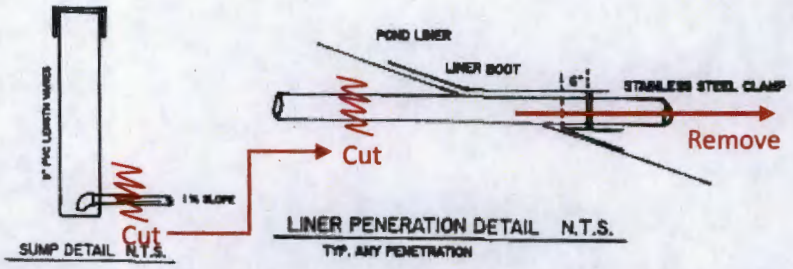
14. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
15. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
16. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

F. Skimmer Pit

1. All netting and fencing surrounding the Skimmer Pit will be removed and placed in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
2. There is no liquid, solid, or sludge accumulation in the Skimmer Pit. In the event that liquid, solid, or sludge accumulation is discovered it will be removed by a vac-truck according A5 procedures.
3. In the event of a spill or release A4 procedures will be followed.
4. The liner of the Skimmer Pit will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will <u>not</u> need OCD approval).
5. The leak detection system soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples, as purposed below. If leak detection system soil is found on the interior slope of the pond, then additional samples will be taken to ensure all soil is equally represented. The samples will then be compared to background, Exhibit #2, to determine if a release has occurred.

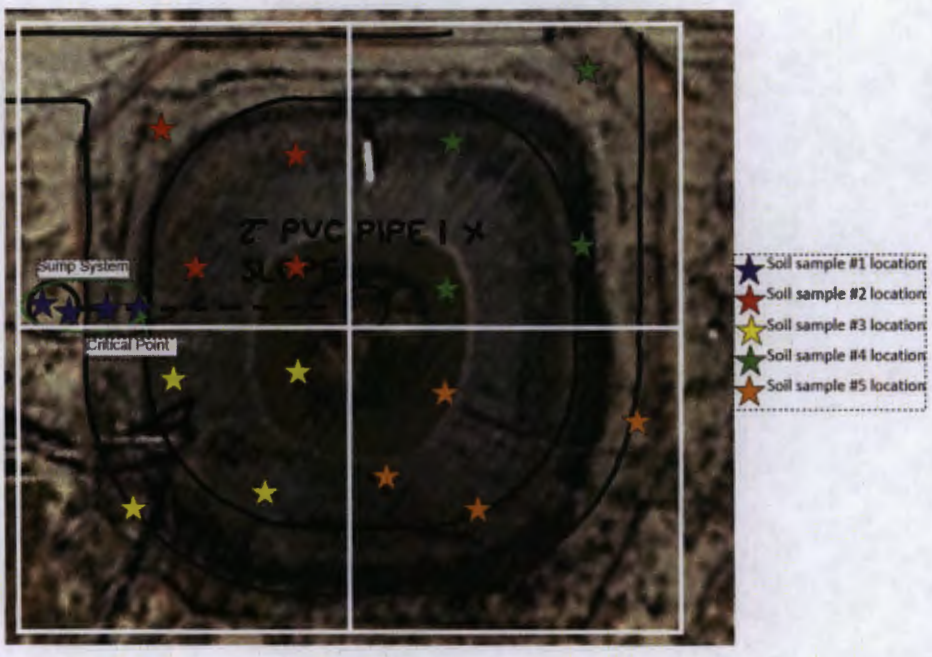
i. If the soil is not contaminated it will be set aside and used as backfill later in the closure plan.
ii. If the soil is contaminated it will be placed in a trailer according to constituents and B2 outline and disposed of according to A5 procedures.

6. The leak detection system piping will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
7. The sump, shown below, will be excavated. The pipe will be cut and pulled through on the pond side, shown below. The Sump, piping, and clamp will be removed, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.



8. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 waste disposal of liquids.
9. Any remaining debris will be removed from the secondary liner via vac-truck and pressure washer according to procedure A5. The secondary liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
10. The geotextile liner will be cut into manageable pieces, cleaned in Steel Pit #2, and loaded on a truck to be disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.m NMAC (the liner will not need OCD approval).
11. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 waste disposal of liquids.
12. The site under the Skimmer Pit will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, metals and other inorganics listed in Subsections A and B of 20.6.2.3.3130 NMAC, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.E.4 NMAC. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite samples consisting of four (4) discrete samples in each of the four (4) grids under the liner and one (1) composite sample consisting of four (4) discrete samples in

the sump system, with one discrete sample being at the point where the sump piping intersects the leak detection liner, as purposed below.



13. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
14. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
15. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

G. Equipment

1. The piping connecting equipment to other equipment and the Skimmer Pit will be removed in manageable pieces, cleaned in Steel Pit #2 and placed in the Sludge Pit awaiting NORM testing and disposal according to A5 procedure, for disposal at San Juan Landfill with OCD approval per rule 19.15.35.8.C.2.j NMAC.
2. The contents of Steel Pit #2 will be removed via vac-truck, according to A5 waste disposal of liquids.
3. The following equipment will be tested for NORM according to A7 procedures (see Exhibit #1 for detailed descriptions):
    - Piping and valve in the Sludge Pit
    - Sludge Pit
    - Steel Pit #1, #2, and #3
    - Shale Shaker Sump
    - 4 Storage Tanks

- 2 Sludge Tanks
- Saddle Tank
- 3 Empty Tanks
- Separator

4. If NORM test are below limits, the piping and contents of Sludge Pit will be placed on a truck and disposed of according to A5 procedures, disposal at San Juan Landfill according to 19.15.35.8.C.1.j NMAC with division's prior written authorization.
5. If NORM test are below limits, the equipment listed above (except for the piping and valve which have been disposed of) will be cleaned according to A6 procedures.
6. Cleaning of the equipment is all self-contained. All waste will be captured inside of the equipment and properly disposed of as according to A5 procedures.
7. In the event of a spill or release A4 procedures will be followed.
8. The cleaned equipment, trailer office, and storage house will be placed in inventory at the nearby M&R Trucking Inc. facility yard located at 281 CR 350 Farmington, NM for future use.
9. The site under the Equipment will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections, per rule 19.15.36.18.D.1.b. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B. At least one (1) composite sample consisting of five (5) discrete samples in each of the four (4) grids, as purposed below.

10. The results of the soil sampling will be compared to the higher of the PQL or the background concentrations, Exhibit #2, to determine whether a release has occurred. In the event of a release A4 procedures will be followed.
11. The area will be backfilled as outlined in Section I, after equipment removal and/or A4 process release.
12. Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

H. Landfarm Cell #1 and Cell #2

1. No Acceptance: Agua Moss has not accepted any additional lifts to the landfarm cells since taking over operations February of 2012.
2. Compliance: Agua Moss will ensure compliance with 19.15.36.15 NMAC and permit conditions during closure activities by the following procedures.
3. Disking biweekly and approved bioremediation will continue until soil within both cells are remediated to the standards provided in Subsection F of 19.15.36.15 NMAC, also in Section 6.ii. below, or otherwise approved by the division.
4. Reports: Annual reports of vadose zone and treatment zone sampling will be submitted to the divisions Santa Fe office until the division has approved the facility's final closure, per rule 19.15.36.18.D.4.g NMAC.
5. Vadose Zone Monitoring
    i. Samples taken from the vadose zone in each cell at depth of two (2) to three (3) feet below the cells original ground surface, per permit conditions and transitional provision 19.15.36.20 NMAC.
    ii. The results of each sampling will be compared to the higher of the PQL or the background, Exhibit #2, soil concentrations to determine whether a release has occurred.
        a. In the event of a release Agua Moss will notify Santa Fe office of the exceedance, and immediately collect and analyze a minimum of four randomly selected, independent samples for TPH, BTEX, chlorides and the constituents listed in Subsections A and B of 20.6.2.3103 NMAC. The results of the re-sampling event and a response action plan will be submitted for the division's approval within 45 days of the initial notification. The response action plan will address changes in the landfarm's operation to prevent further contamination and, if necessary, a plan for remediating existing contamination, per rule 19.15.36.15.E.5 NMAC.
    iii. Copies of the monitoring reports will be kept in a form readily accessible for division inspection, per rule 19.15.36.15.E.4 NMAC.
    iv. Quarterly Monitoring:
        a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
            - TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36
            - BTEX as determined by EPA SW-846 method 8021B or 8260B
    v. Semi-annual Monitoring:
        a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
            - Chlorides as determined by EPA method 300.1

vi. Annual Monitoring:
    a. Collection and analysis of one (1) randomly selected, independent sample from the vadose zone for:
        - Major cations/anions
        - WQCC metals

vii. Five Year Monitoring:
    a. Collection and analysis of four (4) randomly selected, independent sample from the vadose zone for:
        - Constituents listed in Subsections A and B of 20.6.2.3103 NMAC as determined by EPA SW-846 methods 6010B or 6020 or other methods approved by the division.

6. Treatment Zone Monitoring and Closure Performance Standards
    i. Semi-annual Monitoring:
        a. Collection and analysis of one (1) composite sample, consisting of four (4) discrete samples from the treatment zone for:
            - TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36
            - Chlorides as determined by EPA method 300.1

    ii. Closure Standards:
        a. Soil treatment will continue until the contaminated soil has been remediated to the higher of the background concentrations (Exhibit #2) or the following closure performance standards, per rule 19.15.36.15.F NMAC:
            - Benzene as determined by EPA SW-846 method 8021B or 8260B, shall not exceed 0.2 mg/kg.
            - Total BTEX as determined by EPA SW-846 method 8021B or 8260B, shall not exceed 50 mg/kg.
            - The GRO and DRO combined fractions as determined by EPA SW-846 method 8015M shall not exceed 500 mg/kg.
            - TPH as determined by EPA method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg.
            - Chlorides as determined by EPA method 300.1, shall not exceed 500 mg/kg since the depth to ground water is from 55-75 feet according to document General Correspondence Years 1992-1989 starting at page 104.
            - The concentration of constituents listed in Subsections A and B of 20.6.2.3103 NMAC shall be determined by EPA SW-846 methods 6010B or 6020 or other methods approved by the division. If the concentration of those constituents exceeds the PQL or background concentration (Exhibit #2), the operator shall

either perform a site specific risk assessment using EPA approved methods and shall propose closure standards based upon individual site conditions that protect the fresh water, public health, safety and the environment, which shall be subject to division approval or remove pursuant to Paragraph (2) of Subsection G of 19.15.36.15 NMAC and Section A5 for waste disposal, for disposal at San Juan Landfill with division's approval per rule 19.15.35.8.C.3.c NMAC.

b. Compliance with the closure performance standards will be demonstrated by collecting and analyzing a minimum of one (1) composite soil sample, consisting of four (4) discrete samples, per rule 19.15.36.15.F NMAC, until it has demonstrated by monitoring the treatment zone at least semi-annually that the contaminated soil has been treated to the standards specified in Subsection F of 19.15.36.15 NMAC per rule 19.15.36.15.D NMAC (therefore, two subsequent samples being six (6) months apart showing the remediated soils at the standards described above will show compliance and release the landfarm to be re-contoured).

7. Soil Re-vegetation or Removal:
   i. Soils remediated to the standard in Section H6.ii. above and left in place are re-vegetated as outlined in Section J, per rule 19.15.36.15.D.4.b NMAC.
   ii. If treated soils are removed (according to A5 procedure), the cell is filled in with native soil and re-vegetated as outlined in Section J3 and J4.
   iii. Soil that has not been or cannot be remediated to the standards in Section H6.ii. are removed to a division approved surface waste management facility according to A5 procedures and for disposal at San Juan Landfill with division's approval per rule 19.15.35.8.C.3.c NMAC, and the cells are filled in with native soil and re-vegetated as outlined in Section J3 and J4, per rule 19.15.36.18.D.4.c NMAC.
8. Rule 19.15.36.18.D.4.f NMAC: Any remaining buildings, fences, roads, and equipment associated with the land farm will be removed. The site will be cleaned up of any associated debris or equipment and any needed soil tests (including but not limited to stained spots and releases during operation) around the landfarm will be taken as situation requires, per rule 19.15.36.18.D.4.f NMAC. Soil will be sampled, in accordance with the procedures specified in chapter nine of EPA publication SW-846, test methods for evaluating solid waste, physical/chemical methods, for TPH, BTEX, major cations and anions and RCRA metals, in accordance with a gridded plat of the site containing at least four equal sections. TPH as determined by EPA method 418.1 or OCD approved equivalent method demonstrating C6-C36, BTEX as determined by EPA SW-846 method 8021B or 8260B.
9. Berms will be removed and utilized in the re-contouring of the site, per rule 19.15.36.18.D.4.e NMAC.

10. Backfilled: The area will be backfilled as outlined in Section I.
11. Closure Report: Documentation of the closure activities will be sent to the division in the closure report, see Section J1 for details.

I. Reclamation

1. Backfill the site with clean dirt from the location and/or clean dirt brought in.
2. Grading will be sloped to promote proper storm water drainage and to prevent ponding if minor settling occurs. Exhibit #4 is a contour map to aid in proper grading.
3. Drainage at the site is primarily by sheet flow to the north. The site is relatively flat with drainage to the west from the south end of the facility and to the north from the north end of the facility.
4. Wattles will be placed on the slopes along with straw mulching, see Exhibit #6.
5. If significant erosion begins to occur, OCD's approval will be acquired to implement structural, vegetative, and/or stabilization BMP's to limit erosion and will be included in the final closure report.
6. If it becomes necessary, OCD's approval will be acquired to install sediment control structures, where needed, to slow or redirect the runoff and trap sediment.

J. Post Closure

1. Closure Report:
    i. At the completion of the closure activities a closure report will be submitted to the Santa Fe office that summarizes the completed activities , including but not limited to:
        a. Identification of an material disposed of
        b. Sampling results
        c. Backfilling and contouring activities
        d. Contour map
        e. Re-vegetation seeding mixture and application rates
        f. Photo documentation
        g. Applicable final determination from District Office resulting from A4 actions
    ii. The report will include closure activities from the closure of the Unlined Pond in 2012.
2. Care Period: The post closure care period for a landfarm, pond, or pit will be three (3) years once Agua Moss has achieved clean closure. During that period Agua Moss, or other responsible entity will regularly inspect on a quarterly basis and maintain required re-vegetation. If there has been a release to the vadose zone or to ground water, Agua Moss or other responsible entity will comply the A4 spill and release procedures.
3. Re-Vegetation: Areas at the site to be re-vegetated are presented in Exhibit #5. Re-vegetation will consist of establishment of a vegetative cover equal to 70 percent of the native perennial vegetative cover (un-impacted by overgrazing, fire, or other intrusion

damaging to native vegetation) or scientifically documented ecological description consisting of at least three native plant species, including at least one grass, but not including noxious weeds, per rule 19.15.36.18.A.6 NMAC.

   i. The vegetative cover will be maintained through two successive growing seasons, per rule 19.15.36.18.A.6 NMAC.

4. Release of Financial Assurance: per rule 19.15.36.18.B NMAC.
   i. The division shall inspect the site to determine that closure is complete.
   ii. Once complete, financial assurance will be released, less the amount needed for post closure activities.
   iii. After the applicable post closure care period, three years, has expired the division will release the remainder of the financial assurance if the re-vegetation, in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC, is successful.
      a. If contamination is revealed during the surface waste management facility's operation or in the applicable post closure care period following the surface waste management facility's closure the division will not release the financial assurance until the contamination is remediated in accordance with 19.15.30 NMAC and 19.15.29 NMAC, as applicable.

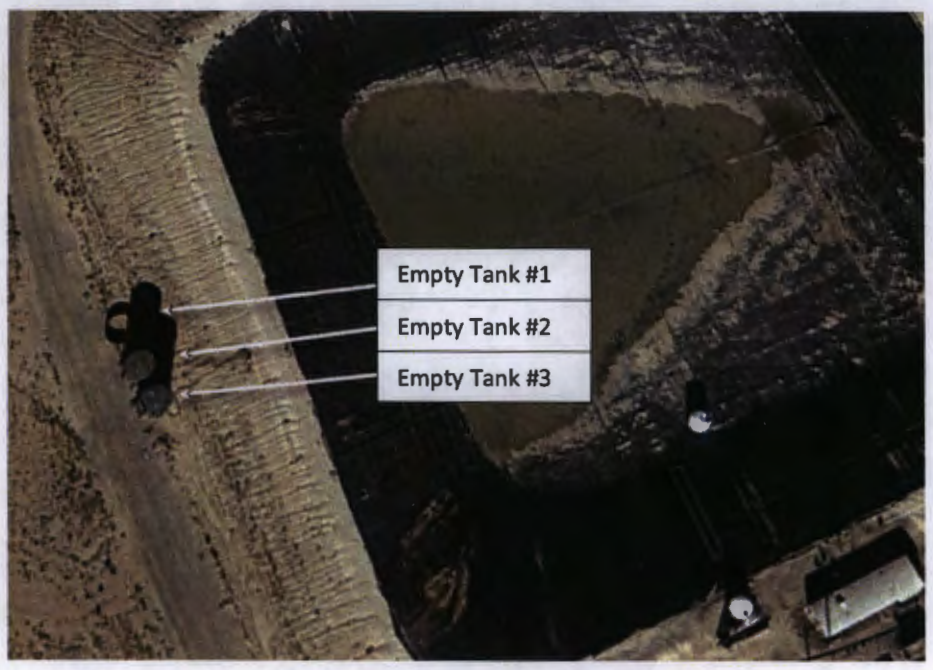
Exhibit #1

Equipment Descriptions

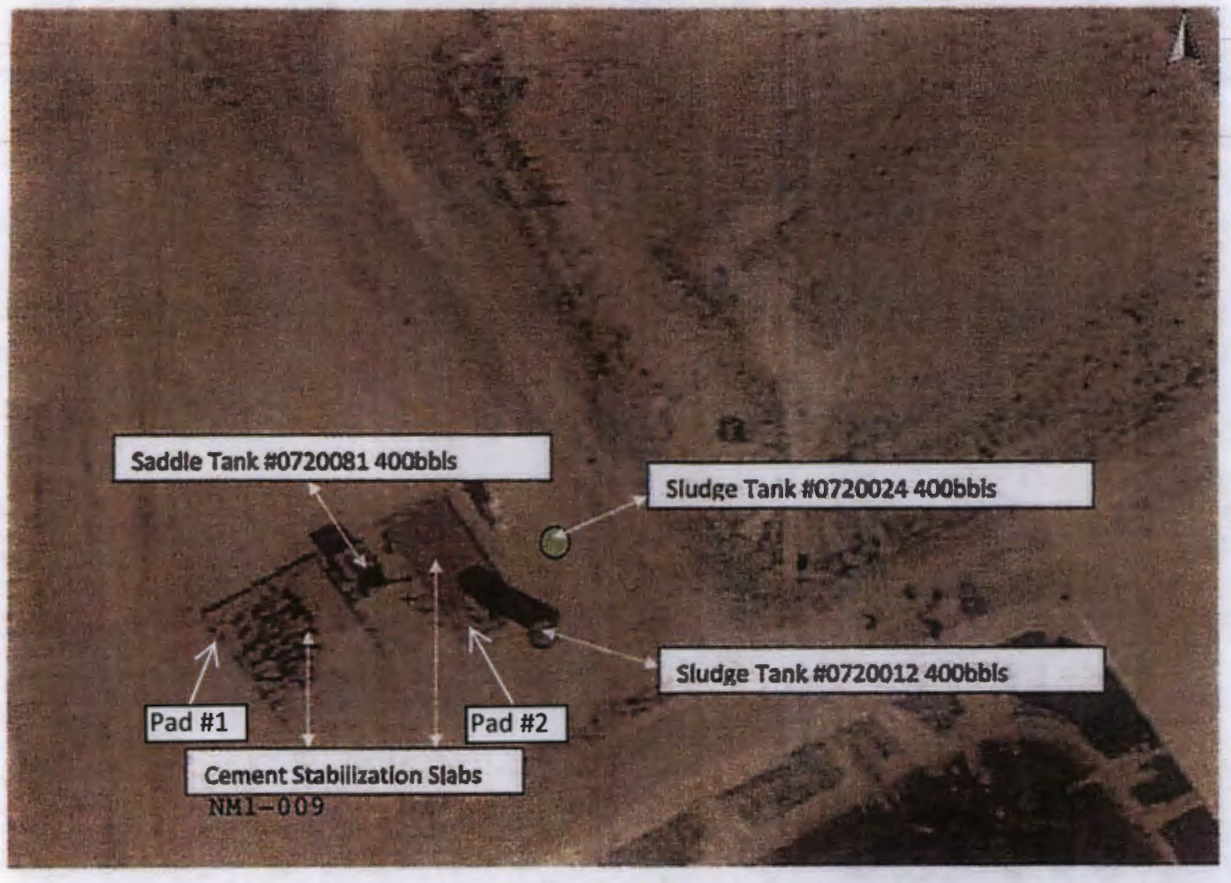
Cleaned and Stored:

1. #1 Steel Pit (Shale Shaker attached) 498 bbls (8' x 10' x 35')
2. #2 Steel Pit 636 bbls
3. #3 Steel Pit 463 bbls
4. Steel Sludge Pit 460 bbls
5. Steel Shale Shaker Sump #0920061 15 bbls
6. Storage Tank #0920049 400 bbls
7. Storage Tank #0920051 300 bbls
8. Storage Tank #0920052 300 bbls
9. Storage Tank #0920053 300 bbls
10. Sludge Tank #1 #0720024 400 bbls (West End)
11. Sludge Tank #2 #0720012 400 bbls (West End)
12. Saddle Tank #0720081 400 bbls (West End)
13. Chlorine Storage Tanks 2600 gallons
14. Separator
15. Empty Tank #1 400 bbls (West side of pond)
16. Empty Tank #2 400 bbls (West side of pond)
17. Empty Tank #3 400 bbls (West side of pond)

Images of the equipment are below and on the following pages.



West End of Location: Detailed Diagram of soil Mixing Containments



This part of the facility is not in use.

Exhibit #1
Diagram #1

South End of Location (NM1-9): Detailed diagram

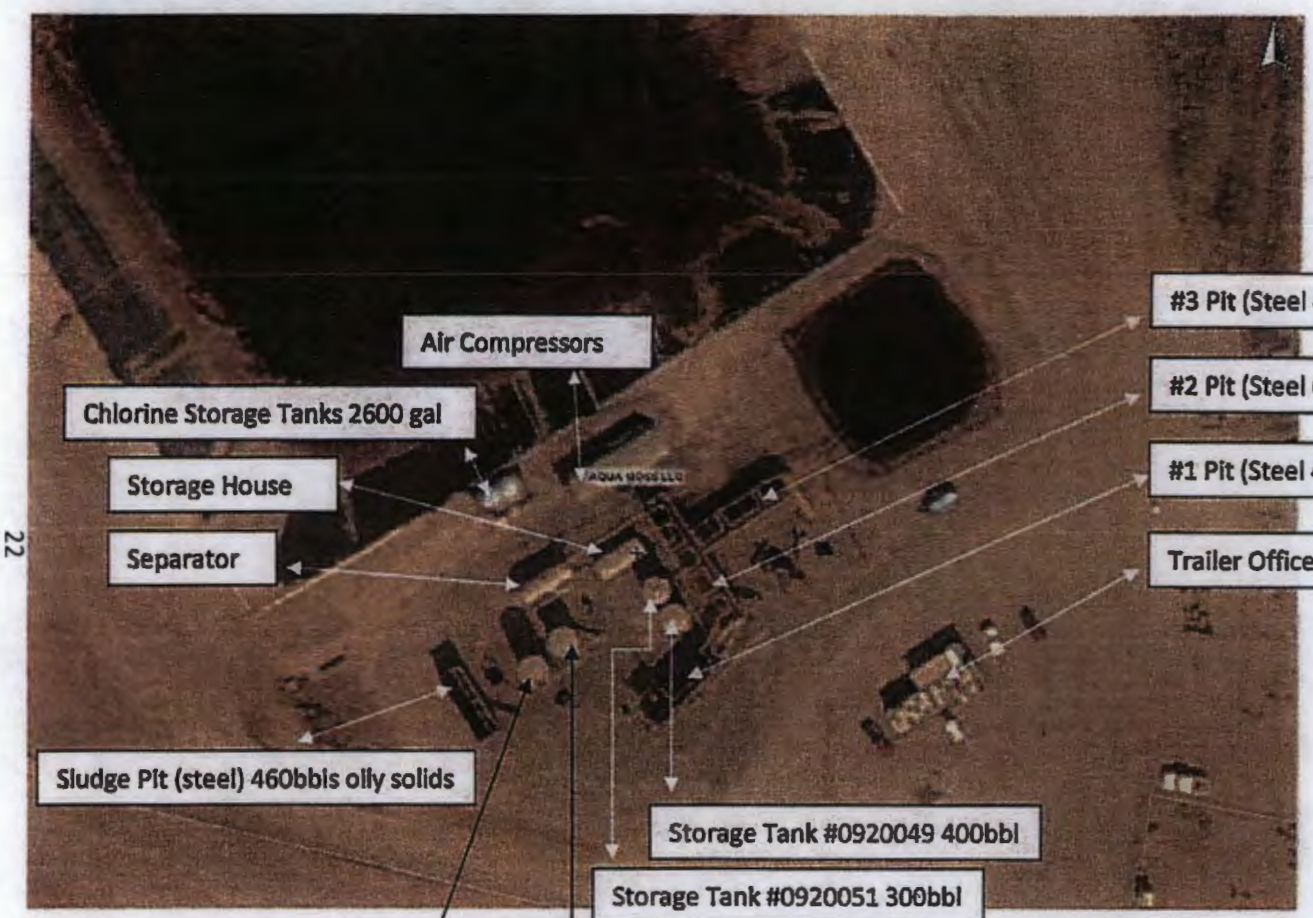


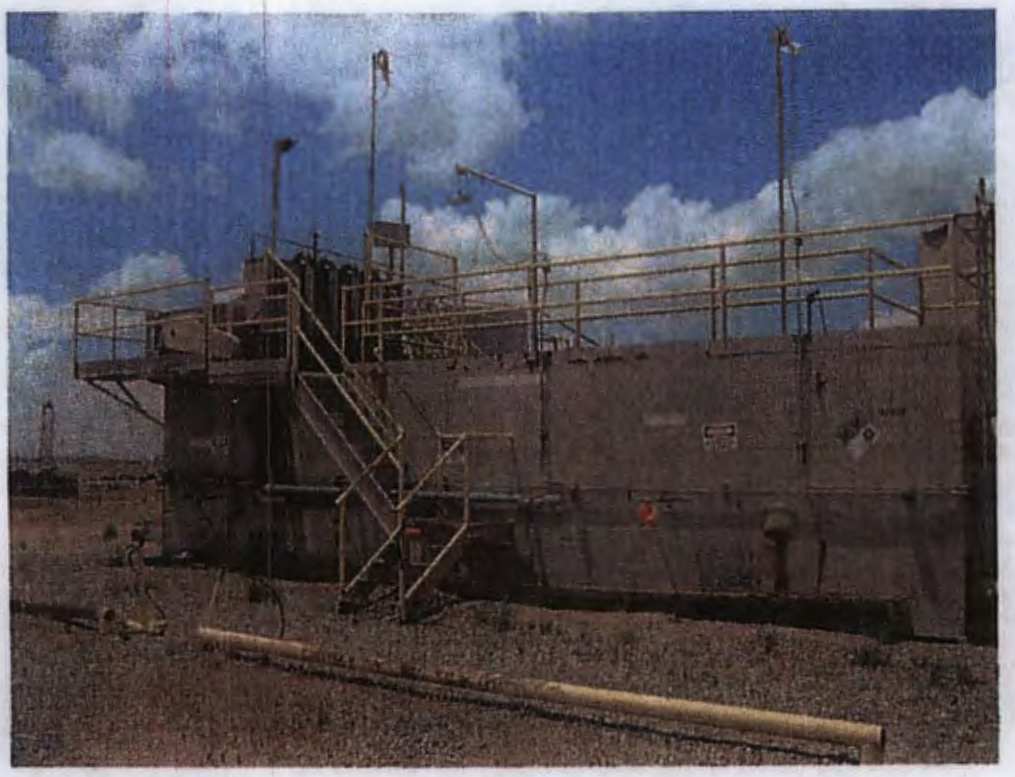
Exhibit #1
Diagram #2

Exhibit #1
Images

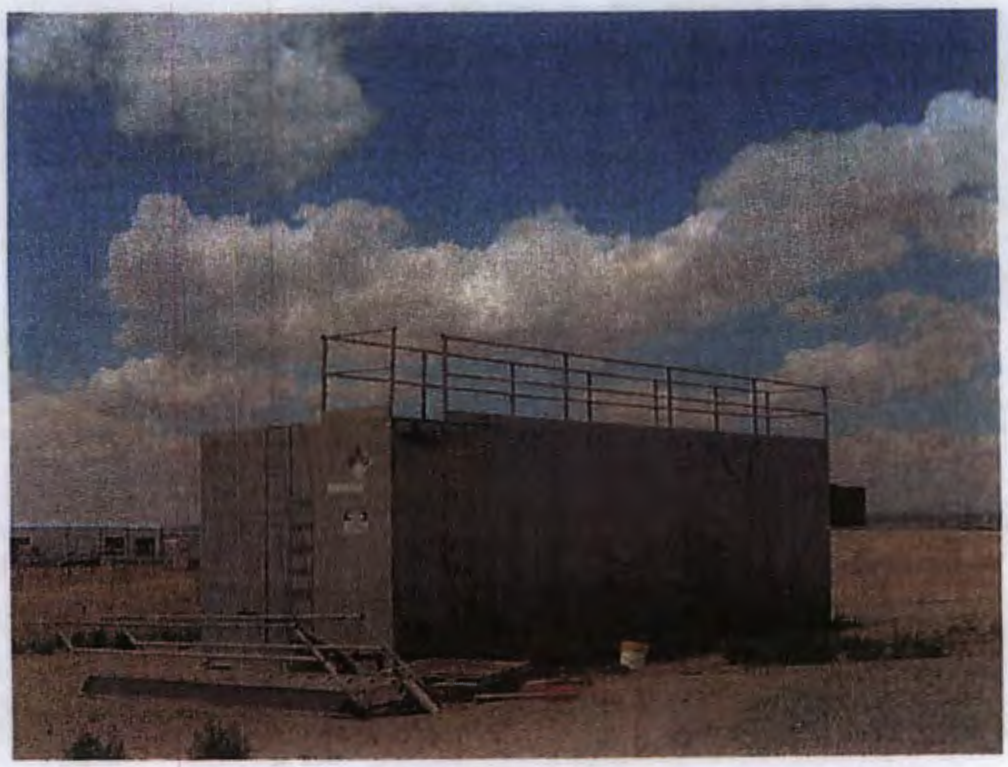
Steel Pit #3

Steel Pit #2

Steel Pit #1 (Shaker)

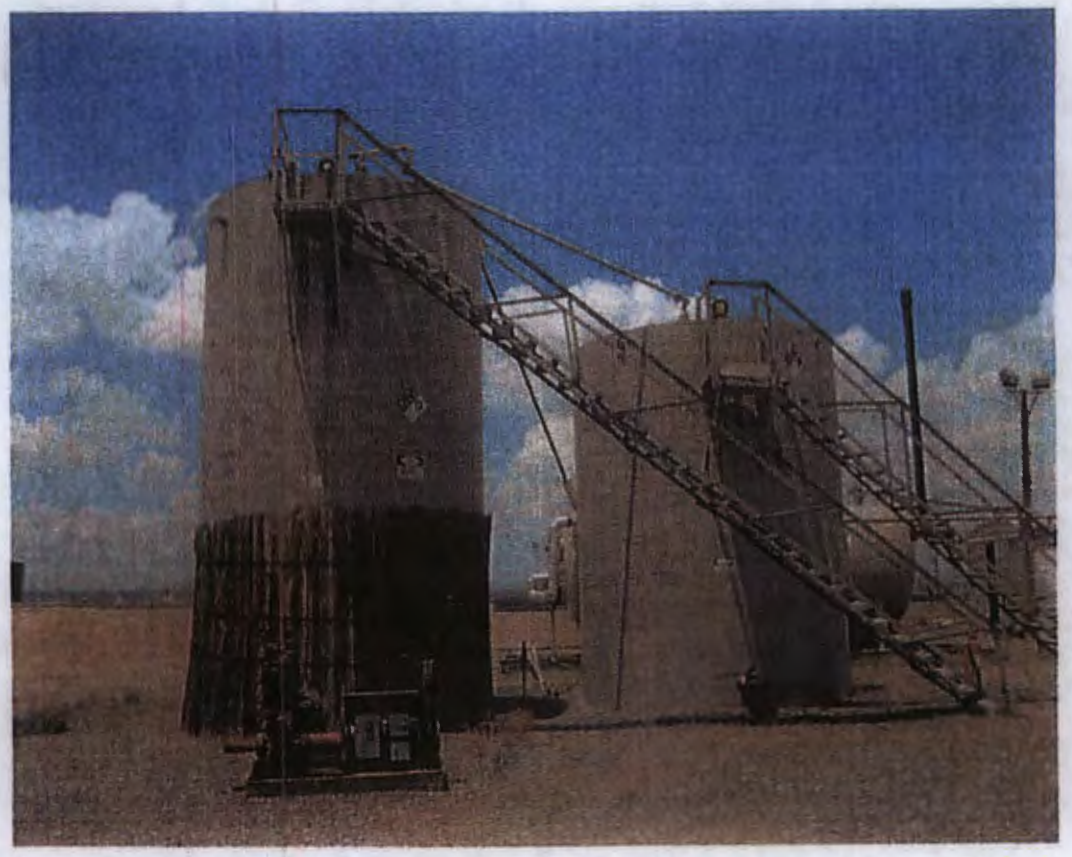


Steel Sludge Pit

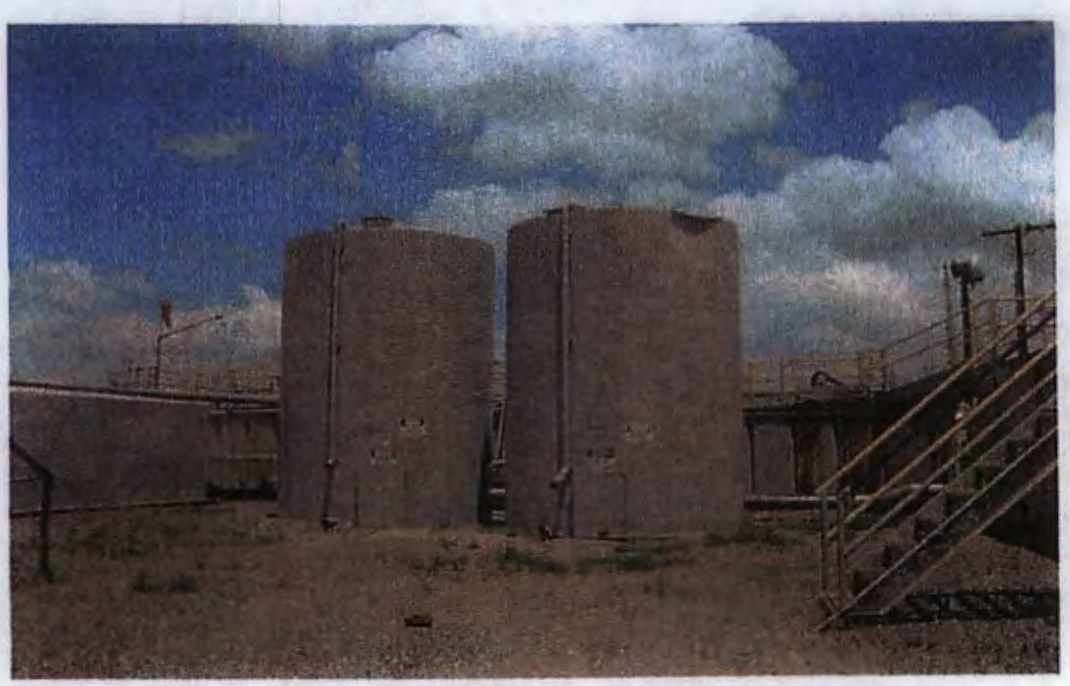



CONFINED
SPACE

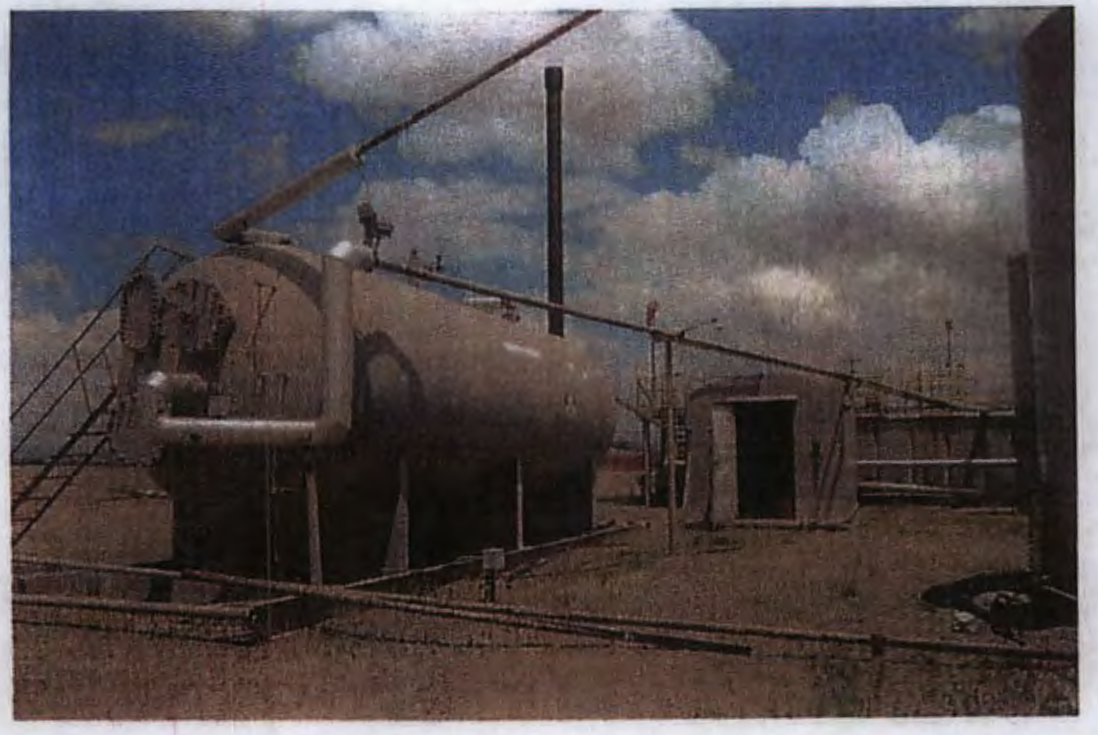
Oil Storage tanks (#0920053 & 0920052)



Storage Tanks (#0920049 & 0920051)



Separator & Storage House



Chlorine Tanks & Air Compressor Shed

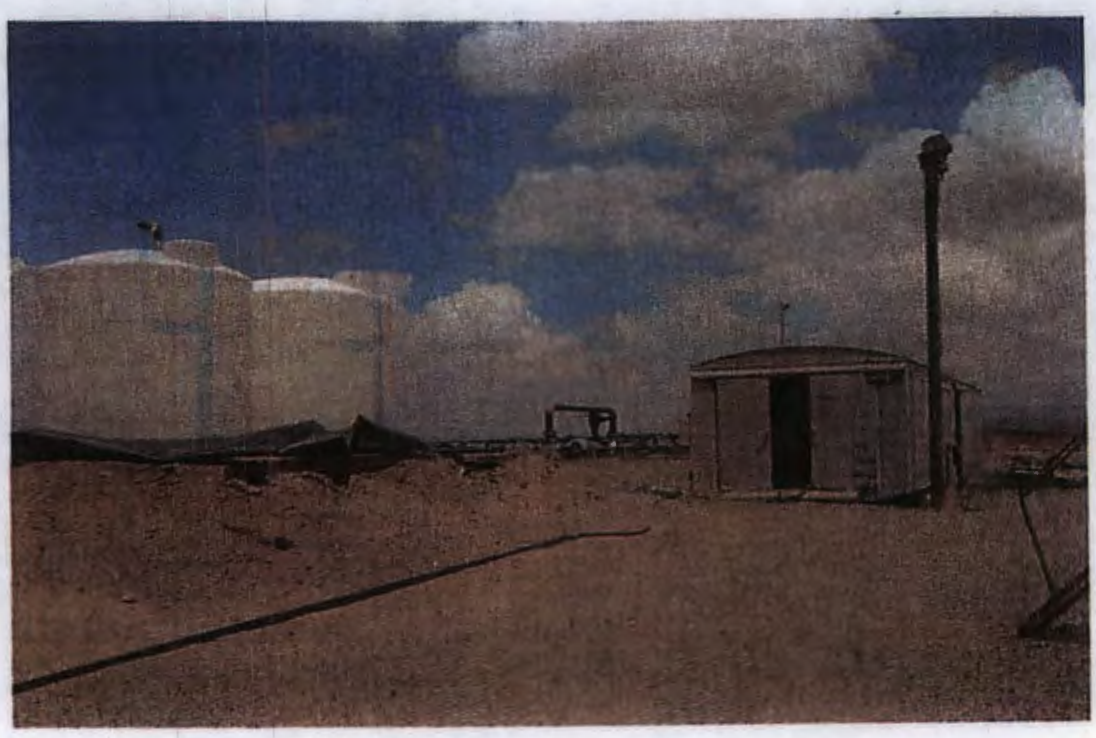


Exhibit #2
Soil Background Concentration

*The following Soil Background Concentration table is currently being updated. Two (2) composite soil samples, testing for the missing constituents in the following table, were taken on May 20, 2015. The analyzed analytical results from the May 20, 2015 sampling will be added to the following table. Once all sampling has been combined and analyzed, it will be sent to the NMOCD for approval. The approved background will be used as the referenced "Exhibit #2 Soil Background Concentration", replacing the following table.

Analyzed Background Soil Concentration

Parameter	SE Corner	NW Corner		Conversion ug/kg to mg/kg		Det. Limit		Conversion ug/kg to mg/kg		Non-Detect Sub. SE Corner	Non-Detect Sub. NW Corner	Mean		Adjusted Facility Background	
Sample Date:	**Sept. 17, 2012**														
Gasoline Range (C5-C10)	ND	ND	(mg/kg)			0.2	(mg/kg)			0.1	0.1	0.1	(mg/kg)	**0.2**	(mg/kg)
Diesel Range (C10-C28)	ND	ND	(mg/kg)			0.1	(mg/kg)			0.05	0.05	0.05	(mg/kg)	**0.1**	(mg/kg)
TPH (Method 8015B)	ND	ND				0.3				0.15	0.15	0.15	(mg/kg)	**0.3**	(mg/kg)
Benzene	ND	ND	(ug/kg)			10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	**0.01**	(mg/kg)
Toluene	ND	ND	(ug/kg)			10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	**0.01**	(mg/kg)
Ethylbenzene	ND	ND	(ug/kg)			10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	**0.01**	(mg/kg)
p,m-Xylene	ND	13.6	(ug/kg)	0.0136	(mg/kg)	10	(ug/kg)	0.01	(mg/kg)	0.005	0.0136	0.0093	(mg/kg)	**0.01**	(mg/kg)
o-Xylene	ND	ND	(ug/kg)			10	(ug/kg)	0.01	(mg/kg)	0.005	0.005	0.005	(mg/kg)	**0.01**	(mg/kg)
Total BTEX	ND	13.6		0.0136	(mg/kg)	50	(ug/kg)	0.05	(mg/kg)	0.025	0.0336	0.0293	(mg/kg)	**0.05**	(mg/kg)
pH	7.78	7.69	(s.u.)							7.78	7.69	7.735	(s.u.)	**7.735**	(s.u.)
Conductivity @ 25°C	476	368	(umhos/cm)							476	368	422	(umhos/cm)	**422**	(umhos/cm)
Total Dissolved Solids @ 180C	332	288	(mg/L)							332	288	310	(mg/L)	**310**	(mg/L)
SAR	1.50	0.400								1.50	0.400	0.95		**0.95**	
Total Alkalinity as CaCO3	98.0	87.0	(mg/L)							98.0	87.0	92.5	(mg/L)	**92.5**	(mg/L)
Total Hardness as CaCO3	124	121	(mg/L)							124	121	122.5	(mg/L)	**122.5**	(mg/L)
Bicarbonate as CaCO3	98.0	87.0	(mg/L)			0.01	(mg/L)			98.0	87.0	92.5	(mg/L)	**92.5**	(mg/L)
Carbonate as CaCO3	<0.01	<0.01	(mg/L)			0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	**0.01**	(mg/L)
Hydroxide as CaCO3	<0.01	<0.01	(mg/L)			0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	**0.01**	(mg/L)
Nitrate Nitrogen	21.6	23.0	(mg/L)			0.01	(mg/L)			21.6	23.0	22.3	(mg/L)	**22.3**	(mg/L)
Nitrite Nitrogen	<0.01	<0.01	(mg/L)			0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	**0.01**	(mg/L)
Chloride	38.2	40.1	(mg/L)			0.01	(mg/L)			38.2	40.1	39.15	(mg/L)	**39.15**	(mg/L)
Fluoride	2.01	<0.01	(mg/L)			0.01	(mg/L)			2.01	0.01	1.0075	(mg/L)	**1.0075**	(mg/L)
Phosphate	<0.01	3.40	(mg/L)			0.01	(mg/L)			0.005	3.40	1.7025	(mg/L)	**1.7025**	(mg/L)
Sulfate	247	34.6	(mg/L)			0.01	(mg/L)			247	34.6	140.8	(mg/L)	**140.8**	(mg/L)
Iron	<0.01	<0.01	(mg/L)			0.01	(mg/L)			0.005	0.005	0.005	(mg/L)	**0.01**	(mg/L)
Calcium	36.5	37.9	(mg/L)			0.01	(mg/L)			36.5	37.9	37.2	(mg/L)	**37.2**	(mg/L)
Magnesium	7.90	6.52	(mg/L)			0.01	(mg/L)			7.90	6.52	7.21	(mg/L)	**7.21**	(mg/L)
Potassium	3.68	12.9	(mg/L)			0.01	(mg/L)			3.68	12.9	8.29	(mg/L)	**8.29**	(mg/L)
Sodium	39.4	10.8	(mg/L)			0.01	(mg/L)			39.4	10.8	25.1	(mg/L)	**25.1**	(mg/L)
Cyanide (total)	0.004	0.002	(mg/L)							0.004	0.002	0.003	(mg/L)	**0.003**	(mg/L)
Arsenic	4.16	3.65	(mg/kg)			0.01	(mg/kg)			4.16	3.65	3.905	(mg/kg)	**3.905**	(mg/kg)
Barium	231	318	(mg/kg)			0.01	(mg/kg)			231	318	274.5	(mg/kg)	**274.5**	(mg/kg)
Cadmium	0.49	0.66	(mg/kg)			0.01	(mg/kg)			0.49	0.66	0.575	(mg/kg)	**0.575**	(mg/kg)
Chromium	8.63	9.25	(mg/kg)			0.01	(mg/kg)			8.63	9.25	8.94	(mg/kg)	**8.94**	(mg/kg)
Copper	6.68	14.0	(mg/kg)			0.01	(mg/kg)			6.68	14.0	10.34	(mg/kg)	**10.34**	(mg/kg)
Lead	11.8	22.3	(mg/kg)			0.01	(mg/kg)			11.8	22.3	17.05	(mg/kg)	**17.05**	(mg/kg)
Mercury	0.41	0.22	(mg/kg)			0.01	(mg/kg)			0.41	0.22	0.315	(mg/kg)	**0.315**	(mg/kg)
Manganese	218	298	(mg/kg)			0.01	(mg/kg)			218	298	258	(mg/kg)	**258**	(mg/kg)
Selenium	0.46	0.73	(mg/kg)			0.01	(mg/kg)			0.46	0.73	0.595	(mg/kg)	**0.595**	(mg/kg)
Silver	ND	0.50	(mg/kg)			0.01	(mg/kg)			0.005	0.50	0.2525	(mg/kg)	**0.2525**	(mg/kg)
Zinc	21.9	54.9	(mg/kg)			0.01	(mg/kg)			21.9	54.9	38.4	(mg/kg)	**38.4**	(mg/kg)
Sample Date:	**May 20, 2015**														
TPH (Method 418.1)															
Uranium															
Polychlorinated Biphenyls															
Carbon Tetrachloride															
1,2-dichloroethane															
1,1-dichloroethylene															
1,1,2,2-tetrachloroethylene															
1,1,2-trichloroethylene															
Methylene Chloride															
Chloroform															
1,1-dichloroethane															
Ethylene Dibromide															
1,1,1-trichloroethane															
1,1,2-trichloroethane															
1,1,2,2-tetrachloroethane															
Vinyl Chloride															
Benzo-a-pyrene															
Phenols															
PAHs: total naphthalene plus monomethylnaphthalenes															
Radioactivity: Combined Radium-226 & Radium-228															

Table will be updated, waiting on

*For ND and < values, 1/2 the Det. Limit was used as substitution method.

Exhibit #3

Facility Picture

Exhibit #4

Contour Map

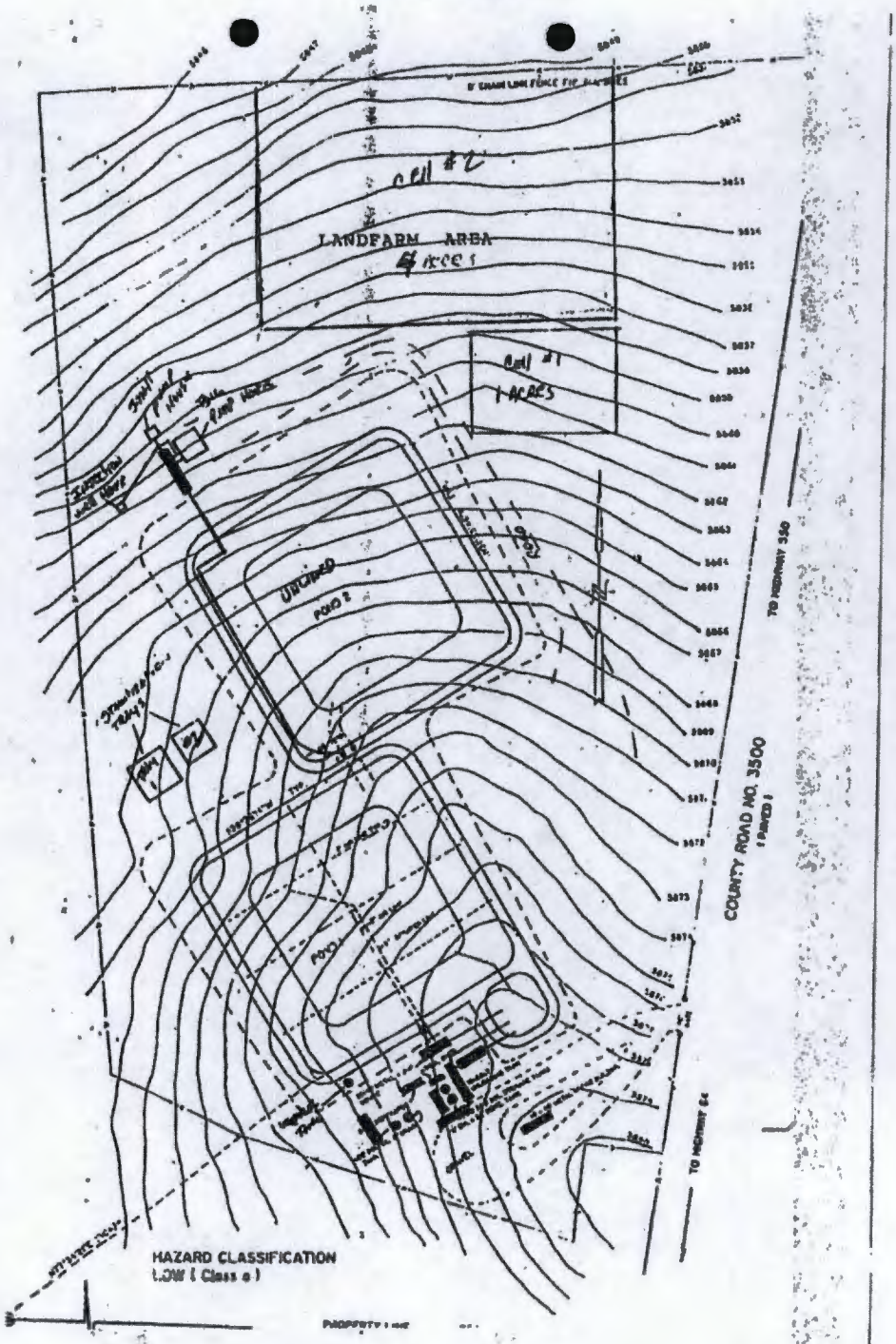


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Exhibit #5

Re-vegetation Map

Sunco Class I Facility UICI-005 & NM1-009 Surface reclamation/vegetation

Exhibit #6

Wattle Description

Straw Wattle

Erosion control and Sediment Retention Wattles (ESW) or Slope Interruption Devices (SID) commonly known as Wattles, are elongated tubes of compacted straw and/or other fibers that are installed along contours or at the base of slopes to help reduce soil erosion and retain sediment. They function by shortening slope length, reducing runoff water velocity, trapping dislodged soil particles and ameliorating the effects of slope steepness. Wattles are used as water flow dissipaters, trapping sediment when located prior to Drain Inlets (D.I.) etc. Wattles are highly effective when they are used in combination with other surface soil erosion/re-vegetation practices such as surface roughening, straw mulching, erosion control blankets, hydraulic mulching and application of bonded fiber matrix or other hydraulic soil stabilizers.