

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
**District II**  
811 S. First St., Artesia, NM 88210  
**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised April 3, 2017

**For temporary pits, below-grade tanks, and multi-well fluid management pits,** submit to the appropriate NMOCD District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
BGT 1 ☒ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request**

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

1.  
Operator: Enduring Resources, LLC OGRID #: 372286  
Address: 200 Energy Court Farmington, NM 87401  
Facility or well name: Chaco 2306 03E 412H  
API Number: 30-039-31262 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr E Section 03 Township 23N Range 6W County: Rio Arriba  
Center of Proposed Design: Latitude 36.25566N Longitude -107.46538W NAD83  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Double wall, double bottom, steel  
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☒ Alternate. Please specify As per BLM specifications

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)☒ Screen ☐ Netting ☐ Other \_\_\_\_\_☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers☒ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

***Please check a box if one or more of the following is requested, if not leave blank:***☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells☐ Yes ☐ No  
☐ NA**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NAWithin incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ NoWithin the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ NoWithin an unstable area. (**Does not apply to below grade tanks**)

- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ NoWithin a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☐ No**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

**Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12. **Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13. **Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative

Proposed Closure Method: ☐ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15. **Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	



adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: CR Whitehead Approval Date: July 29, 2021

Title: Environmental Specialist OCD Permit Number: BGT 1

19.

**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☒ Closure Completion Date: 11/23/2020

20.

**Closure Method:**

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☒ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Chad Snell Title: HSE Tech

Signature:  Date: 12/10/2020

e-mail address: csnell@enduringresources.com Telephone: 505-444-0586

## Enduring Resources, LLC Below Grade Tank Closure Report

**Lease Name: Chaco 2306 03E 412H**

**API No.: 30-039-31262**

**Description: Unit E, Section 3, Township 23N, Range 6W, Rio Arriba County**

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on Enduring Resources, LLC. (Enduring) locations. This is Enduring's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

### **General Plan**

1. Enduring will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.  
**Closure Date is November 23, 2020**
2. Enduring will close a below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.  
**Closure Date is November 23, 2020**
3. Enduring will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.  
**Required C-144 Form is attached to this document.**
4. Enduring will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
  - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
    - Soil contaminated by exempt petroleum hydrocarbons
    - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
  - Basin Disposal Permit No. NM01-005
    - Produced water**All liquids and sludge were removed from the tank prior to closure activities.**
5. Enduring will remove the below-grade tank and dispose of it in a division approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.  
**Enduring has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.**

6. Enduring will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.  
**All on-site equipment has been removed.**
7. Enduring will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 8015M or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 9056A or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. Enduring will notify the division of its results on form C-141.

**A five point composite sample was taken of the pit using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached).**

Components	Test Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.0250 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.1 mg/kg
TPH	EPA SW-846 8015M	100	< 85 mg/kg
Chlorides	EPA 9056A	250 or background	<20 mg/kg

8. If Enduring or the division determines that a release has occurred, Enduring will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.  
**No Release has occurred at this location**
9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, Enduring will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.  
**The site has been backfilled, and will be recontoured and revegetated upon P&A of the wellsite.**
10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.  
The notification will include the following:
- i. Operator's name
  - ii. Well Name and API Number
  - iii. Location by Unit Letter, Section, Township, and Range
- Notification was provided to Mr. Cory Smith with the Aztec office of the OCD via email on November 18, 2020; see attached email printout.**

The surface owner shall be notified of Enduring's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.

**The BLM was notified on November 18, 2020 via email; see attached email printout.**



11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.  
**This site will be recontoured and revegetated once plugging and abandoning activities have been completed. The site will be recontoured to match the above mentioned specifications.**
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.  
**The area has been backfilled to match these specifications.**
13. Enduring will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.  
**The site will be re-seeded per the BLM MOU once plugging and abandoning activities have been completed.**
14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
  - Proof of closure notice to division and surface owner; **attached**
  - Details on capping and covering, where applicable; **per OCD Specifications**
  - Confirmation sampling analytical results; **attached**
  - Disposal facility name(s) and permit number(s); **attached**
  - Soil backfilling and cover installation; **per OCD Specifications**
  - Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **pursuant to BLM MOU**
  - Photo documentation of the site reclamation. **attached**

District I  
1625 N. French Dr., Hobbs, NM 88240  
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811 S. First St., Artesia, NM 88210  
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1000 Rio Brazos Road, Aztec, NM 87410  
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural  
Resources Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: <b>Enduring Resources</b>	OGRID: <b>372286</b>
Contact Name: <b>Chad Snell</b>	Contact Telephone: <b>(505) 444-0586</b>
Contact email: <b>csnell@enduringresources.com</b>	Incident # (assigned by OCD)
Contact mailing address: <b>200 Energy Court</b>	<b>Farmington, New Mexico 87401</b>

### Location of Release Source

Latitude 36.2564951 Longitude -107.464879  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: <b>Chaco 2306 03E 412H</b>	Site Type: <b>Wellsite</b>
Date Release Discovered: <b>N/A</b>	API# (if applicable) <b>30-039-31262</b>

Unit Letter	Section	Township	Range	County
<b>E</b>	<b>3</b>	<b>23N</b>	<b>6W</b>	<b>Rio Arriba</b>

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): <b>UNK</b>	Volume Recovered (bbls): <b>NONE</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release:

On 11/23/2020, BGT closure activities were performed at this location. Samples were collected from beneath the location of the BGT after it was removed, and samples results were below Tale I Standards, confirming that a release had not occurred. No further action is required.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

### Initial Response


*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

- ☒ The source of the release has been stopped.
- ☒ The impacted area has been secured to protect human health and the environment.
- ☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Chad Snell Title: HSE Tech  
Signature:  Date: 12/10/2020  
email: csnell@enduringresources.com Telephone: (505) 444-0586

#### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	<i>Page 12 of 37</i>
District RP	
Facility ID	
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## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

### **Characterization Report Checklist:** *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.



State of New Mexico  
Oil Conservation Division

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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	Page 14 of 37
District RP	
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## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Chad Snell

Title: HSE Tech

Signature: 

Date: 12/10/2020

email: csnell@enduringresources.com

Telephone: (505)444-0586

### OCD Only

Received by: \_\_\_\_\_

Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_



Enduring Resources, LLC  
BGT Closure Report  
Chaco 2306 03E 412H  
30-039-31262

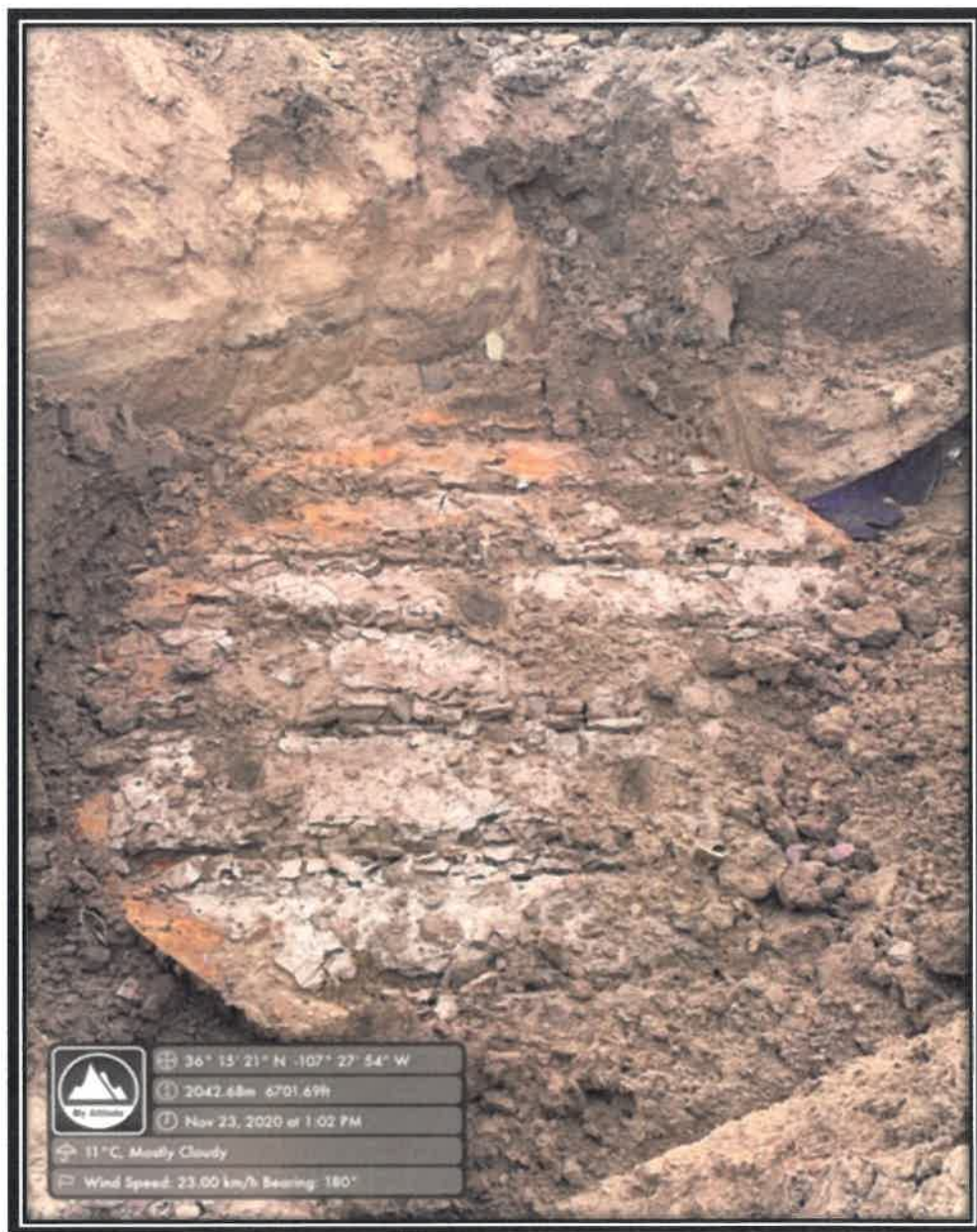


Photo 1: Under BGT





Enduring Resources, LLC  
BGT Closure Report  
Chaco 2306 03E 412H  
30-039-31262

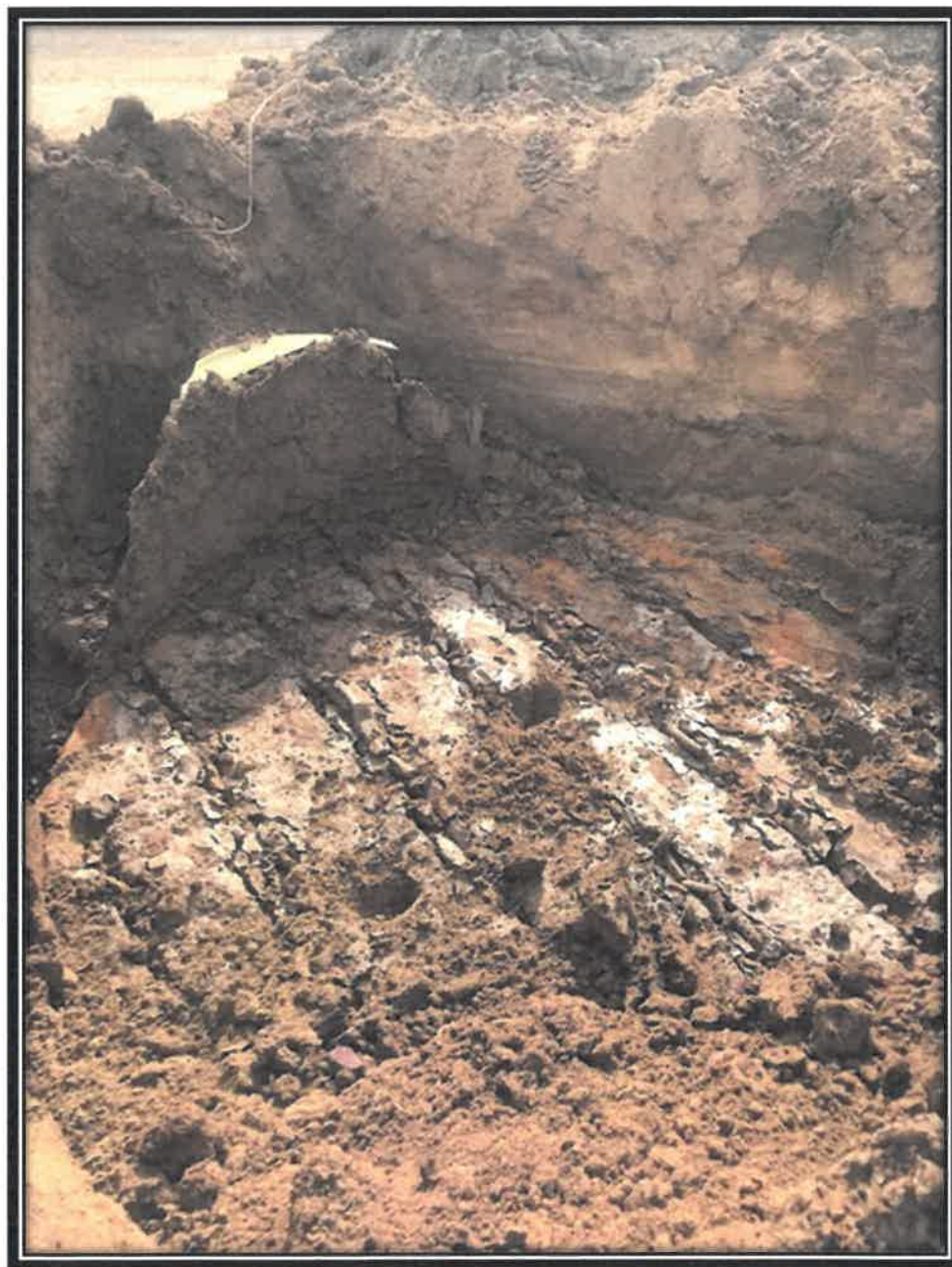


Photo 2: Under BGT

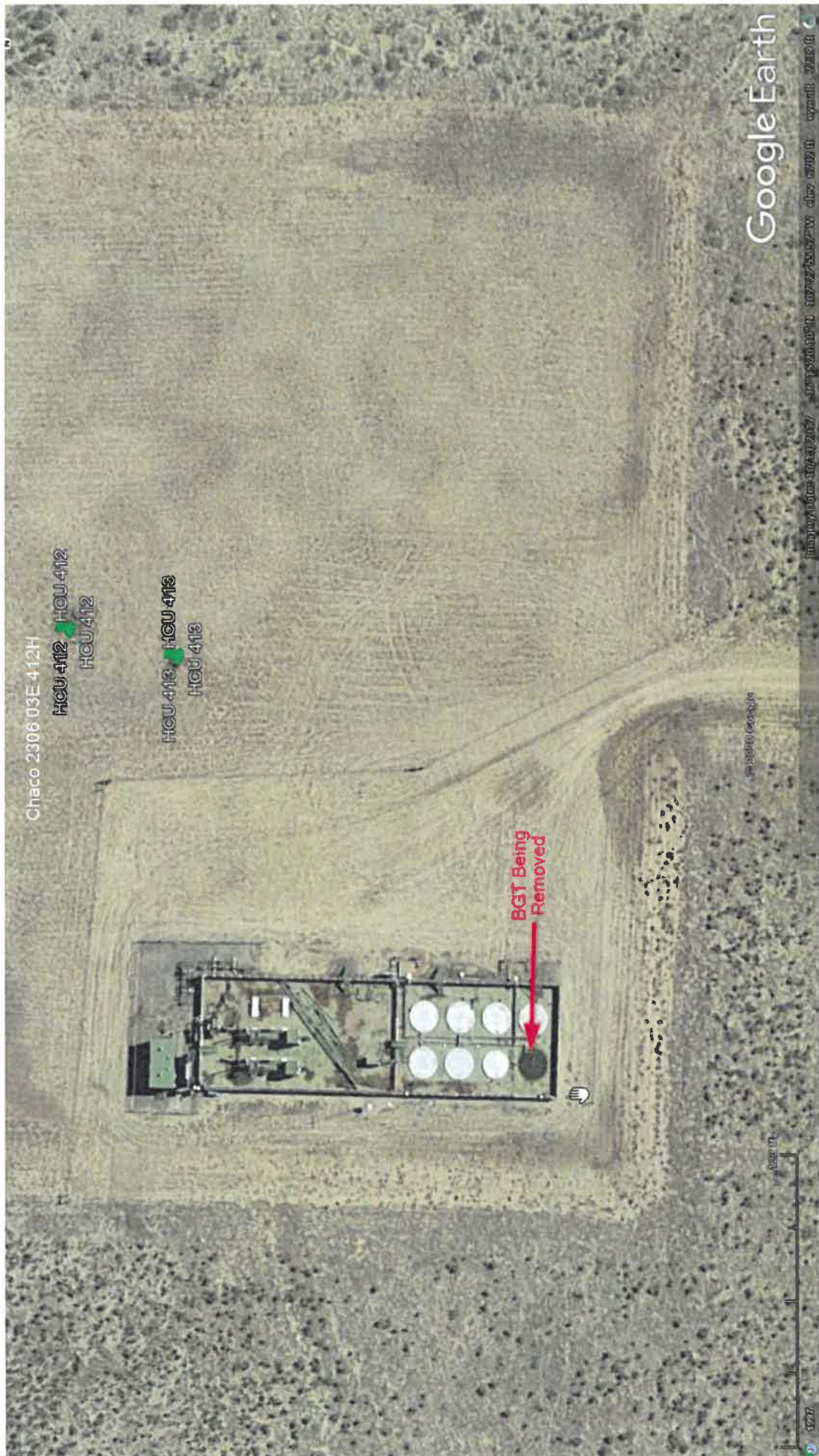


Enduring Resources, LLC  
BGT Closure Report  
Chaco 2306 03E 412H  
30-039-31262

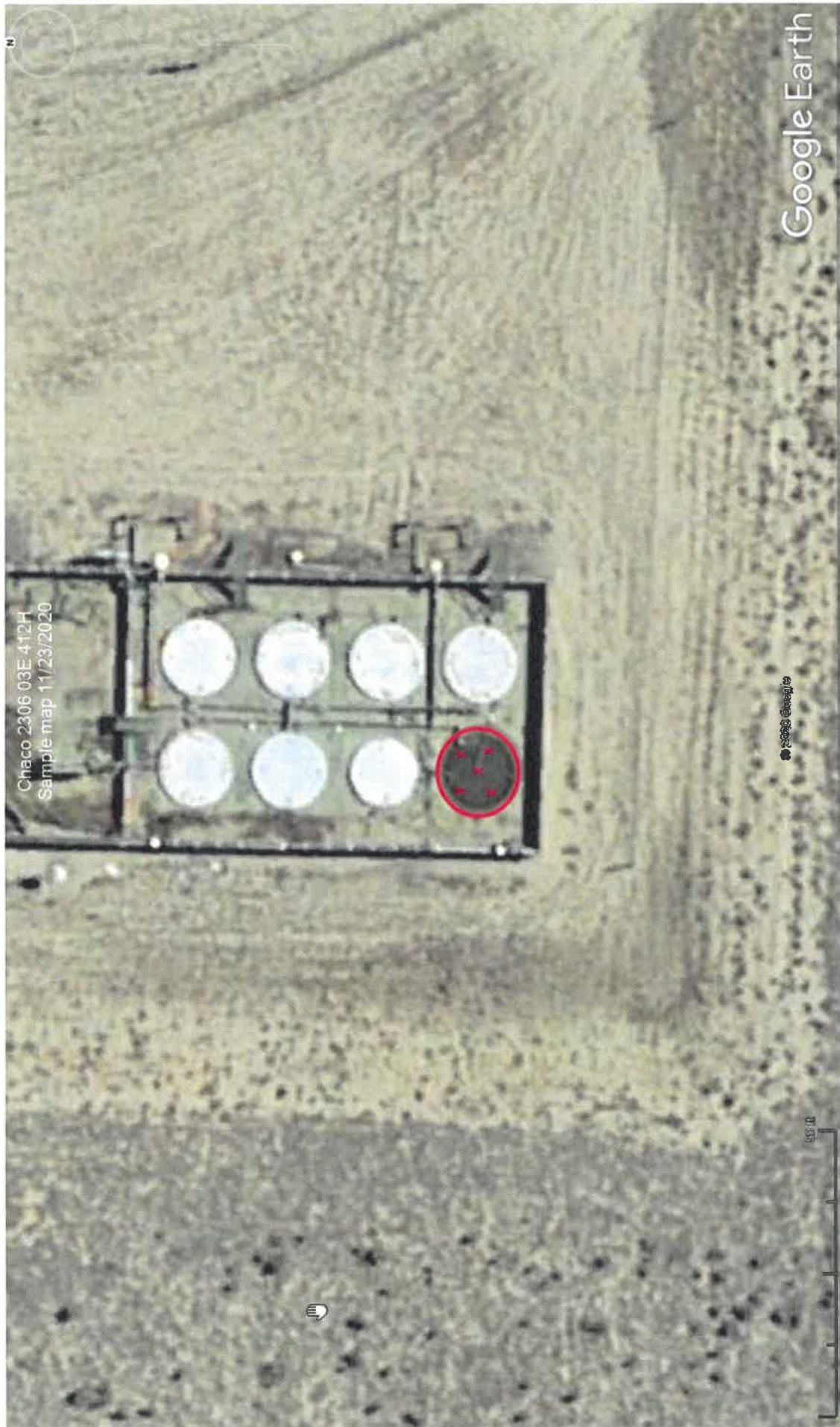


Photo 3: Area Back filled











Mr. Cory Smith  
Oil Conservation Division  
1000 Rio Brazos Rd.  
Aztec, New Mexico 87410  
Email: cory.smith@state.nm.us  
Phone (505) 334-6178 Ext 115

Re: Variance Request for 19.15.17 NMAC Table I and Table II

Mr. Smith,

Please accept this letter as a variance request as outlined in 19.15.17.15(A) NMAC. Enduring Resources, LLC (Enduring) would like to request the replacement of USEPA Method 418.1 for the analysis of Total Petroleum Hydrocarbons (TPH) for USEPA Method 8015M, measuring carbon ranges C6-C36, for all sampling associated with closures and confirmations samples in relation to 19.15.17 NMAC, both in Table I and Table II (2103) and the 'pit rule' passed in 2008. Enduring is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C5 through C40 (*Reference: American Petroleum Institute*).

The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C28-C35. Analytical Method USEPA 418.1 extends past lube oils from C35 through C40. This range of hydrocarbons is above the range that can reasonably be expected to be found in our field in both drilling pits and beneath below grade tanks. USEPA Method 8015M (GRO/DRO + extended analysis) will report hydrocarbons ranging from C6-C10 for GRO, C10- C28 for DRO, and C28-C36 for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C6, reporting lower than USEPA Method 418.1. Utilizing analytical method 8015M, lighter range hydrocarbons will be reported instead of higher range, heavy hydrocarbons that may not be reasonably expected to be found in our field. Utilization of USEPA Method 8015M will better protect groundwater resources by identifying lighter, more mobile hydrocarbons that USEPA Method 418.1 cannot identify. The heavier range hydrocarbons, C36-C40, that are not identified by USEPA Method 8015M are not a mobile form of hydrocarbon, and are not a threat to human health and the environment. With your acceptance of this variance request, Enduring Resources will begin utilizing USEPA Method 8015M in place of USEPA Method 418.1 for all sampling activities associated with 19.15.17 NMAC, both from the rules passed in 2008 and 2013.

Respectfully Submitted,  
Chad Snell  
HSE Tech  
Enduring Resources, LLC

#### **Carbon Ranges of Typical Hydrocarbons**

##### **Hydrocarbon Carbon Range**

**Condensate C2-C12**

**Aromatics C5-C7**

**Gasoline C7-C11**

**Kerosene C6-C16**

**Diesel Fuel C8-C21**

**Fuel Oil #1 C9-C16**

**Fuel Oil #2 C11-C20**

**Heating Oil C14-C20**

**Lube Oil C28-C35**

**Chad Snell**

---

**From:** Chad Snell  
**Sent:** Wednesday, November 25, 2020 10:57 AM  
**To:** 'Smith, Cory, EMNRD'; 'Powell, Brandon, EMNRD'  
**Cc:** 'aadeloye@blm.gov'; Tim Friesenhahn; Heather Huntington  
**Subject:** RE: Chaco 2306 03E 412H BGT Closure approval

Cory,

No worries sorry for the confusion. Yes it was closed on the 23rd

**From:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>  
**Sent:** Wednesday, November 25, 2020 9:20 AM  
**To:** Chad Snell <CSnell@enduringresources.com>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>  
**Cc:** aadeloye@blm.gov; Tim Friesenhahn <TFriesenhahn@enduringresources.com>; Heather Huntington <Hhuntington@enduringresources.com>  
**Subject:** RE: Chaco 2306 03E 412H BGT Closure approval

Chad,

I must have typed the wrong API# it is indeed in the online system. Everything look good to go..

Was the take closed out on the 23?

**Cory Smith** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1000 Rio Brazos | Aztec, NM 87410  
505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Chad Snell <[CSnell@enduringresources.com](mailto:CSnell@enduringresources.com)>  
**Sent:** Tuesday, November 24, 2020 1:10 PM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>  
**Cc:** [aadeloye@blm.gov](mailto:aadeloye@blm.gov); Tim Friesenhahn <[TFriesenhahn@enduringresources.com](mailto:TFriesenhahn@enduringresources.com)>; Heather Huntington <[Hhuntington@enduringresources.com](mailto:Hhuntington@enduringresources.com)>  
**Subject:** [EXT] RE: Chaco 2306 03E 412H BGT Closure approval

Cory,

Attached is the Copy of the closure plan.

**From:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Sent:** Tuesday, November 24, 2020 10:11 AM  
**To:** Chad Snell <[CSnell@enduringresources.com](mailto:CSnell@enduringresources.com)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>  
**Cc:** [aadeloye@blm.gov](mailto:aadeloye@blm.gov); Tim Friesenhahn <[TFriesenhahn@enduringresources.com](mailto:TFriesenhahn@enduringresources.com)>; Heather Huntington <[Hhuntington@enduringresources.com](mailto:Hhuntington@enduringresources.com)>  
**Subject:** RE: Chaco 2306 03E 412H BGT Closure approval

Chad,

I do not see an Approved closure Plan in our system. Enduring needs to have an approved closure plan prior to initiating closure of the BGT that is why I was asking if you had a copy.

Thanks

**Cory Smith • Environmental Specialist**  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1000 Rio Brazos | Aztec, NM 87410  
505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Chad Snell <[CSnell@enduringresources.com](mailto:CSnell@enduringresources.com)>  
**Sent:** Wednesday, November 18, 2020 12:03 PM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>  
**Cc:** [aadeloye@blm.gov](mailto:aadeloye@blm.gov); Tim Friesenhahn <[TFriesenhahn@enduringresources.com](mailto:TFriesenhahn@enduringresources.com)>; Heather Huntington <[Hhuntington@enduringresources.com](mailto:Hhuntington@enduringresources.com)>  
**Subject:** [EXT] RE: Chaco 2306 03E 412H BGT Closure approval

Cory,  
We are closing the BGT pursuant to the closure plan in the permit that was submitted by WPX in 2015. The BGT will be removed and sampling will take place on Monday November 23<sup>rd</sup> 2020 at 12:00pm. Please let me know if you still have any questions or if there is anything else that you would need from me regarding this.

Thank you.

**From:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Sent:** Tuesday, November 17, 2020 2:39 PM  
**To:** Chad Snell <[CSnell@enduringresources.com](mailto:CSnell@enduringresources.com)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>  
**Cc:** [aadeloye@blm.gov](mailto:aadeloye@blm.gov); Tim Friesenhahn <[TFriesenhahn@enduringresources.com](mailto:TFriesenhahn@enduringresources.com)>; Heather Huntington <[Hhuntington@enduringresources.com](mailto:Hhuntington@enduringresources.com)>  
**Subject:** RE: Chaco 2306 03E 412H BGT Closure approval

Chad,

I am not aware of any WPX/Williams permits left to be processed. Do you have a copy of received version from the OCD by any chance?

Cory Smith  
Environmental Specialist  
Oil Conservation Division  
Energy, Minerals, & Natural Resources  
1000 Rio Brazos, Aztec, NM 87410  
(505)334-6178 ext 115  
[cory.smith@state.nm.us](mailto:cory.smith@state.nm.us)

**From:** Chad Snell <[CSnell@enduringresources.com](mailto:CSnell@enduringresources.com)>  
**Sent:** Friday, November 13, 2020 2:32 PM

**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>  
**Cc:** [aadeloye@blm.gov](mailto:aadeloye@blm.gov); Tim Friesenhahn <[TFriesenhahn@enduringresources.com](mailto:TFriesenhahn@enduringresources.com)>; Heather Huntington  
<[Hhuntington@enduringresources.com](mailto:Hhuntington@enduringresources.com)>  
**Subject:** [EXT] Chaco 2306 03E 412H BGT Closure approval

Good Morning,

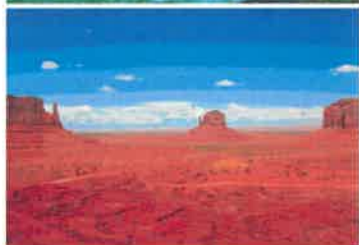
Enduring is requesting approval of closure plan for the BGT at the Chaco 2306 03E 412H (API: 30-039-31262, Sec:3, Twn:23N, Rge:6W) Plan was submitted by WPX in 2015. Required notice of BGT closure activities will be sent at a later date but closure activities are projected to be at the end of next week. Please let me know if you have any questions.

Thanks.

Chad Snell  
HSE Tech  
Enduring Resources  
(505) 444-0586.



Report to:  
Chad Snell



5796 U.S. Hwy 64  
Farmington, NM 87401

Phone: (505) 632-1881  
Envirotech-inc.com



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

Enduring Resources, LLC

Project Name: Chaco 412

Work Order: E011091

Job Number: 17065-0017

Received: 11/24/2020

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
12/2/20

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.  
Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.  
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.  
Envirotech Inc, holds the Utah TNI certification NM009792018-1 for data reported.  
Envirotech Inc, holds the Texas TNI certification T104704557-19-2 for data reported.

Date Reported: 12/2/20

Chad Snell  
511 16th Street, Suite 700  
Denver, CO 80202



Project Name: Chaco 412  
Workorder: E011091  
Date Received: 11/24/2020 8:15:00AM

Chad Snell,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 11/24/2020 8:15:00AM, under the Project Name: Chaco 412.

The analytical test results summarized in this report with the Project Name: Chaco 412 apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues regarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

**Walter Hinchman**  
Laboratory Director  
Office: 505-632-1881  
Cell: 775-287-1762  
[whinchman@envirotech-inc.com](mailto:whinchman@envirotech-inc.com)

**Raina Schwanz**  
Laboratory Administrator  
Office: 505-632-1881  
[rainaschwanz@envirotech-inc.com](mailto:rainaschwanz@envirotech-inc.com)

**Alexa Michaels**  
Sample Custody Officer  
Office: 505-632-1881  
[labadmin@envirotech-inc.com](mailto:labadmin@envirotech-inc.com)

Envirotech Web Address: [www.envirotech-inc.com](http://www.envirotech-inc.com)

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**Sample Summary**

Enduring Resources, LLC 511 16th Street, Suite 700 Denver CO, 80202	Project Name: Chaco 412 Project Number: 17065-0017 Project Manager: Chad Snell	Reported: 12/02/20 09:44
---	--	-----------------------------

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	E011091-01A	Soil	11/23/20	11/24/20	Glass Jar, 4 oz.





## Sample Data

Enduring Resources, LLC 511 16th Street, Suite 700 Denver CO, 80202	Project Name: Chaco 412 Project Number: 17065-0017 Project Manager: Chad Snell	Reported: 12/2/2020 9:44:01AM
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## BGT Composite

E011091-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg	Analyst: IY			Batch: 2048027
Benzene	ND	0.0250	1	11/25/20	12/01/20	
Toluene	ND	0.0250	1	11/25/20	12/01/20	
Ethylbenzene	ND	0.0250	1	11/25/20	12/01/20	
p,m-Xylene	ND	0.0500	1	11/25/20	12/01/20	
o-Xylene	ND	0.0250	1	11/25/20	12/01/20	
Total Xylenes	ND	0.0250	1	11/25/20	12/01/20	
Surrogate: 4-Bromochlorobenzene-PID	100 %	70-130		11/25/20	12/01/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg	Analyst: IY			Batch: 2048027
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/25/20	12/01/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	84.4 %	70-130		11/25/20	12/01/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg	Analyst: JL			Batch: 2048009
Diesel Range Organics (C10-C28)	ND	25.0	1	11/30/20	12/01/20	
Oil Range Organics (C28-C35)	ND	50.0	1	11/30/20	12/01/20	
Surrogate: n-Nonane	115 %	50-200		11/30/20	12/01/20	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg	Analyst: NE			Batch: 2048028
Chloride	ND	20.0	1	11/25/20	11/30/20	



## QC Summary Data

Enduring Resources, LLC 511 16th Street, Suite 700 Denver CO, 80202	Project Name: Chaco 412 Project Number: 17065-0017 Project Manager: Chad Snell	Reported: 12/2/2020 9:44:01AM
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## Volatile Organics by EPA 8021B

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2048027-BLK1)

Prepared: 11/25/20 Analyzed: 11/30/20

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.94		8.00		99.2	70-130			

## LCS (2048027-BS1)

Prepared: 11/25/20 Analyzed: 11/30/20

Benzene	4.68	0.0250	5.00		93.7	70-130			
Toluene	4.92	0.0250	5.00		98.4	70-130			
Ethylbenzene	4.95	0.0250	5.00		98.9	70-130			
p,m-Xylene	9.81	0.0500	10.0		98.1	70-130			
o-Xylene	4.92	0.0250	5.00		98.3	70-130			
Total Xylenes	14.7	0.0250	15.0		98.2	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.05		8.00		101	70-130			

## Matrix Spike (2048027-MS1)

Source: E011088-01 Prepared: 11/25/20 Analyzed: 11/30/20

Benzene	4.98	0.0250	5.00	ND	99.7	54-133			
Toluene	5.26	0.0250	5.00	ND	105	61-130			
Ethylbenzene	5.28	0.0250	5.00	ND	106	61-133			
p,m-Xylene	10.4	0.0500	10.0	ND	104	63-131			
o-Xylene	5.22	0.0250	5.00	0.0326	104	63-131			
Total Xylenes	15.7	0.0250	15.0	0.0326	104	63-131			
Surrogate: 4-Bromochlorobenzene-PID	8.07		8.00		101	70-130			

## Matrix Spike Dup (2048027-MSD1)

Source: E011088-01 Prepared: 11/25/20 Analyzed: 11/30/20

Benzene	4.63	0.0250	5.00	ND	92.6	54-133	7.35	20	
Toluene	4.90	0.0250	5.00	ND	98.0	61-130	7.01	20	
Ethylbenzene	4.92	0.0250	5.00	ND	98.3	61-133	7.09	20	
p,m-Xylene	9.73	0.0500	10.0	ND	97.3	63-131	7.09	20	
o-Xylene	4.88	0.0250	5.00	0.0326	96.9	63-131	6.82	20	
Total Xylenes	14.6	0.0250	15.0	0.0326	97.2	63-131	7.00	20	
Surrogate: 4-Bromochlorobenzene-PID	8.20		8.00		103	70-130			



## QC Summary Data

Enduring Resources, LLC	Project Name:	Chaco 412	Reported:
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	Chad Snell	12/2/2020 9:44:01AM

## Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2048027-BLK1)

Prepared: 11/25/20 Analyzed: 11/30/20

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.76		8.00		84.5	70-130			

## LCS (2048027-BS2)

Prepared: 11/25/20 Analyzed: 11/30/20

Gasoline Range Organics (C6-C10)	47.9	20.0	50.0		95.9	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.81		8.00		85.2	70-130			

## Matrix Spike (2048027-MS2)

Source: E011088-01 Prepared: 11/25/20 Analyzed: 11/30/20

Gasoline Range Organics (C6-C10)	45.2	20.0	50.0	ND	90.4	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.82		8.00		85.3	70-130			

## Matrix Spike Dup (2048027-MSD2)

Source: E011088-01 Prepared: 11/25/20 Analyzed: 11/30/20

Gasoline Range Organics (C6-C10)	44.3	20.0	50.0	ND	88.6	70-130	1.98	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.86		8.00		85.7	70-130			



## QC Summary Data

Enduring Resources, LLC 511 16th Street, Suite 700 Denver CO, 80202	Project Name: Chaco 412 Project Number: 17065-0017 Project Manager: Chad Snell	Reported: 12/2/2020 9:44:01AM
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## Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2048009-BLK1)

Prepared: 11/30/20 Analyzed: 11/30/20

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C35)	ND	50.0							
Surrogate: n-Nonane	46.0		50.0		92.0	50-200			

## LCS (2048009-BS1)

Prepared: 11/30/20 Analyzed: 11/30/20

Diesel Range Organics (C10-C28)	420	25.0	500		84.0	38-132			
Surrogate: n-Nonane	43.0		50.0		85.9	50-200			

## Matrix Spike (2048009-MS1)

Source: E011075-01 Prepared: 11/30/20 Analyzed: 11/30/20

Diesel Range Organics (C10-C28)	419	25.0	500	ND	83.8	38-132			
Surrogate: n-Nonane	38.5		50.0		77.0	50-200			

## Matrix Spike Dup (2048009-MSD1)

Source: E011075-01 Prepared: 11/30/20 Analyzed: 11/30/20

Diesel Range Organics (C10-C28)	445	25.0	500	ND	89.0	38-132	5.99	20	
Surrogate: n-Nonane	45.8		50.0		91.6	50-200			





## QC Summary Data

Enduring Resources, LLC 511 16th Street, Suite 700 Denver CO, 80202	Project Name: Chaco 412 Project Number: 17065-0017 Project Manager: Chad Snell	Reported: 12/2/2020 9:44:01AM
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## Anions by EPA 300.0/9056A

Analyst: NE

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2048028-BLK1)

Prepared: 11/25/20 Analyzed: 11/29/20

Chloride ND 20.0

## LCS (2048028-BS1)

Prepared: 11/25/20 Analyzed: 11/29/20

Chloride 261 20.0 250 104 90-110

## Matrix Spike (2048028-MS1)

Source: E011083-01 Prepared: 11/25/20 Analyzed: 11/29/20

Chloride 410 100 250 156 102 80-120

## Matrix Spike Dup (2048028-MSD1)

Source: E011083-01 Prepared: 11/25/20 Analyzed: 11/30/20

Chloride 412 100 250 156 102 80-120 0.438 20

## QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.



## Definitions and Notes

Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Chaco 412  
Project Number: 17065-0017  
Project Manager: Chad Snell

**Reported:**  
12/02/20 09:44

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

Note (1): Methods marked with \*\* are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.



[illegible]

## Envirotech Analytical Laboratory

Printed: 11/24/2020 1:49:08PM

## Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Enduring Resources, LLC	Date Received:	11/24/20 08:15	Work Order ID:	E011091
Phone:	(505) 636-9729	Date Logged In:	11/24/20 13:46	Logged In By:	Alexa Michaels
Email:	csnell@EnduringResources.com	Due Date:	12/03/20 17:00 (5 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC? Yes
  2. Does the number of samples per sampling site location match the COC? Yes
  3. Were samples dropped off by client or carrier? Yes
  4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
  5. Were all samples received within holding time? Yes
- Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold times are not included in this discussion.

Carrier: Chad SnellComments/ResolutionSample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT? Yes

Sample Cooler

7. Was a sample cooler received? Yes
  8. If yes, was cooler received in good condition? Yes
  9. Was the sample(s) received intact, i.e., not broken? Yes
  10. Were custody/security seals present? No
  11. If yes, were custody/security seals intact? NA
  12. Was the sample received on ice? If yes, the recorded temperature is 4°C, i.e., 6°±2°C Yes
- Note: Thermal preservation is not required, if samples are received w/in 15 minutes of sampling
13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

14. Are aqueous VOC samples present? No
15. Are VOC samples collected in VOA Vials? NA
16. Is the headspace less than 6-8 mm (pea sized or less)? NA
17. Was a trip blank (TB) included for VOC analyses? NA
18. Are non-VOC samples collected in the correct containers? Yes
19. Is the appropriate volume/weight or number of sample containers collected? Yes

Field Label

20. Were field sample labels filled out with the minimum information:
  - Sample ID? Yes
  - Date/Time Collected? Yes
  - Collectors name? Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved? No
22. Are sample(s) correctly preserved? NA
24. Is lab filtration required and/or requested for dissolved metals? No

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase? No
27. If yes, does the COC specify which phase(s) is to be analyzed? NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory? No
29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: NA

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date



envirotech Inc.



**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 11840

CONDITIONS

Operator: ENDURING RESOURCES, LLC 1050 17TH STREET, SUITE 2500 DENVER, CO 80265	OGRID: 372286
	Action Number: 11840
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	7/29/2021