

**Jones, Brad A., EMNRD**

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**From:** Cathy Smith [CSmith@huntingtonenergy.com]  
**Sent:** Wednesday, February 15, 2012 9:11 AM  
**To:** Jones, Brad A., EMNRD  
**Subject:** BLM C144 Permit to Operate Approval List 2\_15\_12 (b).xlsx  
**Attachments:** BLM C144 Permit to Operate Approval List 2\_15\_12 (b).xlsx

Brad,

Attached is a list of 14 wells for approval to operate BGT's. We are seeking C-144 approval for the permits to operate. The BGTs will be upgraded to meet the new NMOCD standards. I will send additional BGT approvals later this month.

I will be out of the office February 16 – 22. I will be checking my emails from home when I get a chance. If you have any problems, just send me an email & I will get back to you as soon as I can.

Thank you!

Cathy Smith  
Huntington Energy, L.L.C.  
908 N.W. 71<sup>st</sup> St.  
Oklahoma City, OK 73116  
(405) 840-9876 ext. 129

HUNTINGTON ENERGY, L.L.C. BGT APPLICATION LIST

WELL TYPE	WELL NAME	API#	UL	LOCATION		FOOTAGES	LATITUDE	LONGITUDE	COUNTY	ST
				SEC/TOWNSHIP/RANGE						
F	CANYON LARGO UNIT 128	30-039-05620	M	SW/4 SEC 6-24N-6W		840' FSL & 840' FWL	36.33636	-107.51503	RIO ARRIBA	NM
F	CANYON LARGO UNIT NP 182	30-039-23550	P	SE/4 SEC 2-24N-7W		790' FSL & 790' FEL	36.33653	-107.53854	RIO ARRIBA	NM
F	CANYON LARGO UNIT 303	30-039-22685	O	SE/4 SEC 5-24N-6W		790' FSL & 1850' FEL	36.33659	-107.48839	RIO ARRIBA	NM
F	CANYON LARGO UNIT 304	30-039-22687	C	NW/4 SEC 11-24N-6W		790' FNL & 1850' FWL	36.33217	-107.43991	RIO ARRIBA	NM
F	CANYON LARGO UNIT 306	30-039-23083	K	SW/4 SEC 11-24N-6W		1850' FSL & 2150' FWL	36.32500	-107.43890	RIO ARRIBA	NM
F	CANYON LARGO UNIT 308	30-039-23650	G	NE/4 SEC 5-24N-6W		2010' FNL & 1720' FEL	36.34363	-107.48804	RIO ARRIBA	NM
F	CANYON LARGO UNIT 332	30-039-23326	A	SEC 1-24N-7W		970' FNL & 960' FEL	36.34691	-107.52109	RIO ARRIBA	NM
F	CANYON LARGO UNIT 333	30-039-23346	E	SEC 1-24N-7W		2060' FNL & 990' FWL	36.34401	-107.53249	RIO ARRIBA	NM
F	CANYON LARGO UNIT 337	30-039-23399	L	SEC 5-24N-6W		1630' FSL & 790' FWL	36.33896	-107.49745	RIO ARRIBA	NM
F	CANYON LARGO UNIT 338	30-039-23401	J	SEC 6-24N-6W		1910' FSL & 1670' FEL	36.33957	-107.50577	RIO ARRIBA	NM
F	CANYON LARGO UNIT 339	30-039-23400	C	SEC 6-24N-6W		790' FNL & 1690' FWL	36.34740	-107.51207	RIO ARRIBA	NM
F	CANYON LARGO UNIT 340	30-039-23402	I	SEC 1-24N-7W		1850' FSL & 990' FEL	36.33913	-107.52124	RIO ARRIBA	NM
F	CANYON LARGO UNIT 341	30-039-23403	N	SEC 1-24N-7W		990' FSL & 1850' FWL	36.33693	-107.52957	RIO ARRIBA	NM
F	CANYON LARGO UNIT NP 347	30-039-23575	H	NE/SE, SEC 1-24N-7W		2645' FNL & 690' FEL	36.34277	-107.51962	RIO ARRIBA	NM

District I  
1625 N. French Dr., Hobbs, NM 88240

District II  
1301 W. Grand Avenue, Artesia, NM 88210

District III  
1000 Rio Brazos Road, Aztec, NM 87400

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  
July 21, 2008

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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

- Type of action: ☒ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☐ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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: Huntington Energy, L.L.C. OGRID #: 208706  
Address: 908 N.W. 71<sup>st</sup> St., Oklahoma City, OK 73116  
Facility or well name: Canyon Largo Unit #338  
API Number: 30-039-23401 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr J Section 6 Township 24N Range 6W County: Rio Arriba  
Center of Proposed Design: Latitude 36.33957 Longitude -107.50577 NAD: ☐ 1927 ☒ 1983  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.

☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A  
☐ 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.

☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC  
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other \_\_\_\_\_  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_

4.

☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 50 bbl Type of fluid: Produced Water  
Tank Construction material: 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 \_\_\_\_\_

5.

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

6.

**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 4' hogwire fence with a single strand of barbed wire on top.

7.

**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)

8.

**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 19.15.3.103 NMAC

9.

**Administrative Approvals 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:**

- ☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

**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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.

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

☐ Yes ☒ No

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 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (*Applies to temporary, emergency, or cavitation pits and below-grade tanks*)

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

☐ Yes ☒ No  
☐ NA

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (*Applies to permanent pits*)

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

☐ Yes ☐ No  
☒ NA

Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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 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 500 feet of a wetland.

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

☐ 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

11. **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: \_\_\_\_\_

12. **Closed-loop Systems 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.

☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9  
☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: \_\_\_\_\_

☐ Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13. **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

14. **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 ☐ Closed-loop System  
☐ 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15. **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 F 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 I of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)**Instructions:** Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?☐ Yes (If yes, please provide the information below) ☐ No*Required for impacted areas which will not be used for future service and operations:*☐ 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 I of 19.15.17.13 NMAC☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste.

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

☐ Yes ☐ No  
☐ NA

Ground water is between 50 and 100 feet below the bottom of the buried waste

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

☐ Yes ☐ No  
☐ 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

☐ Yes ☐ No  
☐ NA

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 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 private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.

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

☐ Yes ☐ No

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 500 feet of a wetland.

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

☐ 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 &amp; Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

18.

**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 F of 19.15.17.13 NMAC☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**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): Catherine Smith Title: Regulatory

Signature: Catherine Smith Date: 5/6/2009

e-mail address: csmith@huntingtonenergy.com Telephone: 405-840-9876

20.

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

OCD Representative Signature: [Signature] Approval Date: 2/15/12

Title: Environmental Engineer OCD Permit Number: \_\_\_\_\_

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 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: \_\_\_\_\_

22.

**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.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

*Required for impacted areas which will not be used for future service and operations:*

☐ Site Reclamation (Photo Documentation)  
☐ Soil Backfilling and Cover Installation  
☐ Re-vegetation Application Rates and Seeding Technique

24.

**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)  
☐ 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

25.

**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): \_\_\_\_\_ Title: \_\_\_\_\_

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

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

**New Mexico Office of the State Engineer**  
**POD Reports and Downloads**

Township:  Range:  Sections: NAD27 X:  Y:  Zone:   Search Radius: County:   Basin:   Number:  Suffix: Owner Name: (First)  (Last)  ☐ Non-Domestic ☐ Domestic ☒ All

POD/ Surface Data Report	Avg Depth to Water Report	Water Column Report
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Clear Form	iWATERS Menu	Help
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WATER COLUMN REPORT 04/09/2009

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

(quarters are biggest to smallest)

POD Number	Tws	Rng	Sec	q	q	q	Zone	X	Y	Depth Well	Depth Water	Water (in feet) Column
SJ 00681 14	24N	06W	24	4	3					127		

Record Count: 1



**New Mexico Office of the State Engineer**  
**POD Reports and Downloads**

Township:  Range:  Sections:

NAD27 X:  Y:  Zone:  Search Radius:

County:  Basin:  Number:  Suffix:

Owner Name: (First)  (Last)  ☐ Non-Domestic ☐ Domestic ☒ All

POD / Surface Data Report

Avg Depth to Water Report

Water Column Report

Clear Form

iWATERS Menu

Help

**AVERAGE DEPTH OF WATER REPORT 04/09/2009**

(Depth Water in Feet)

Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max	Avg
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No Records found, try again

New Mexico Office of the State Engineer  
POD Reports and Downloads

Township: 24N Range: 06W Sections:

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) ☐ Non-Domestic ☐ Domestic ☒ All    

## POD / SURFACE DATA REPORT 04/09/2009

DB File Nbr	Use	(acre ft per annum)	Diversion	Owner	POD Number	Source	(quarters are 1=NW 2=NE 3=SW 4=SE)				X Y are in Feet		UTM are in Meters	
							Tws	Rng	Sec	q q q	Zone	X	Y	UTM Zone
SJ 00202	OFM		10	BURLINGTON RESOURCES OIL & GAS	SJ 00202	Shallow	24N	06W	11	4	3	13	281366	
SJ 00681	STK		8	HOMER C. BERRY	SJ 00681 36		24N	06W	11	3	4	13	280965	
SJ 00681 13	STK	4.839		HOMER C. BERRY	SJ 00681 13		24N	06W	11	1	4	13	280886	
SJ 00681 14	IRR		80	HOMER C. BERRY	SJ 00681 14		24N	06W	24	4	3	13	282864	
SJ 00681 16	STK	24.195		HOMER C. BERRY	SJ 00681 16		24N	06W	07	3	4	13	274606	
SJ 00681 17	STK		8	HOMER C. BERRY	SJ 00681 17		24N	06W	33	4	2	13	278397	
SJ 00681 20	STK		30	HOMER C. BERRY	SJ 00681 20		24N	06W	03	4	2	13	280321	
SJ 00681 21	STK	24.195		HOMER C. BERRY	SJ 00681 21		24N	06W	11	3	4	13	280965	
SJ 00681 22	STK	12.9		HOMER C. BERRY	SJ 00681 22		24N	06W	11	4	4	13	281665	
SJ 00681 23	STK	16.13		HOMER C. BERRY	SJ 00681 23		24N	06W	13	2	2	13	283251	
SJ 00681 25	STK		3	HOMER C. BERRY	SJ 00681 25		24N	06W	13	1	2	13	282645	
SJ 00681 29	IRR		300	HOMER C. BERRY	SJ 00681 29		24N	06W	12	4	3	13	283065	
SJ 00681 3	STK	4.839		HOMER C. BERRY	SJ 00681 3		24N	06W	09	1	1	13	277280	
SJ 00681 30	IRR		420	HOMER C. BERRY	SJ 00681 30		24N	06W	03	2	4	13	280338	
SJ 00681 32	STK		48	HOMER C. BERRY	SJ 00681 32		24N	06W	11	3	4	13	280965	
SJ 00681 34	STK		32	HOMER C BERRY	SJ 00681 34		24N	06W	13	2	1	13	282952	
SJ 00681 35	IRR		16	HOMER C. BERRY	SJ 00681 35		24N	06W	02	3	3	13	280606	
SJ 00681 36	STK		48	HOMER C. BERRY	SJ 00681 36		24N	06W	11	3	4	13	280965	
SJ 00681 4	STK	9.678		HOMER C. BERRY	SJ 00681 4		24N	06W	18	3	1	13	273955	
SJ 01961	OIL		5	MERRION OIL & GAS CORPORATION	SJ 01961	Shallow	24N	06W	03	4	2	13	280222	
					SJ 01961 EXPL		24N	06W	03	4	2	13	280222	

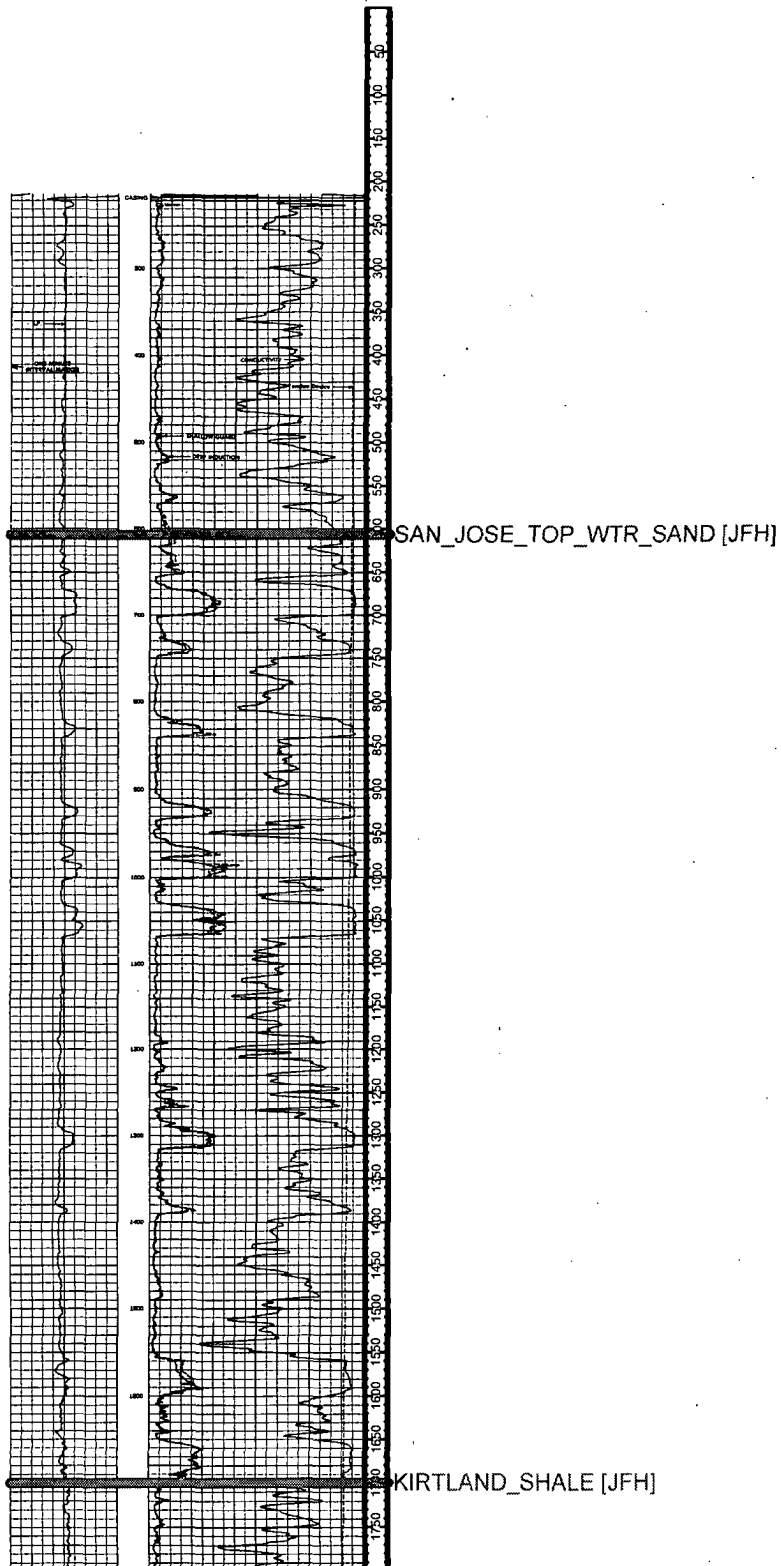
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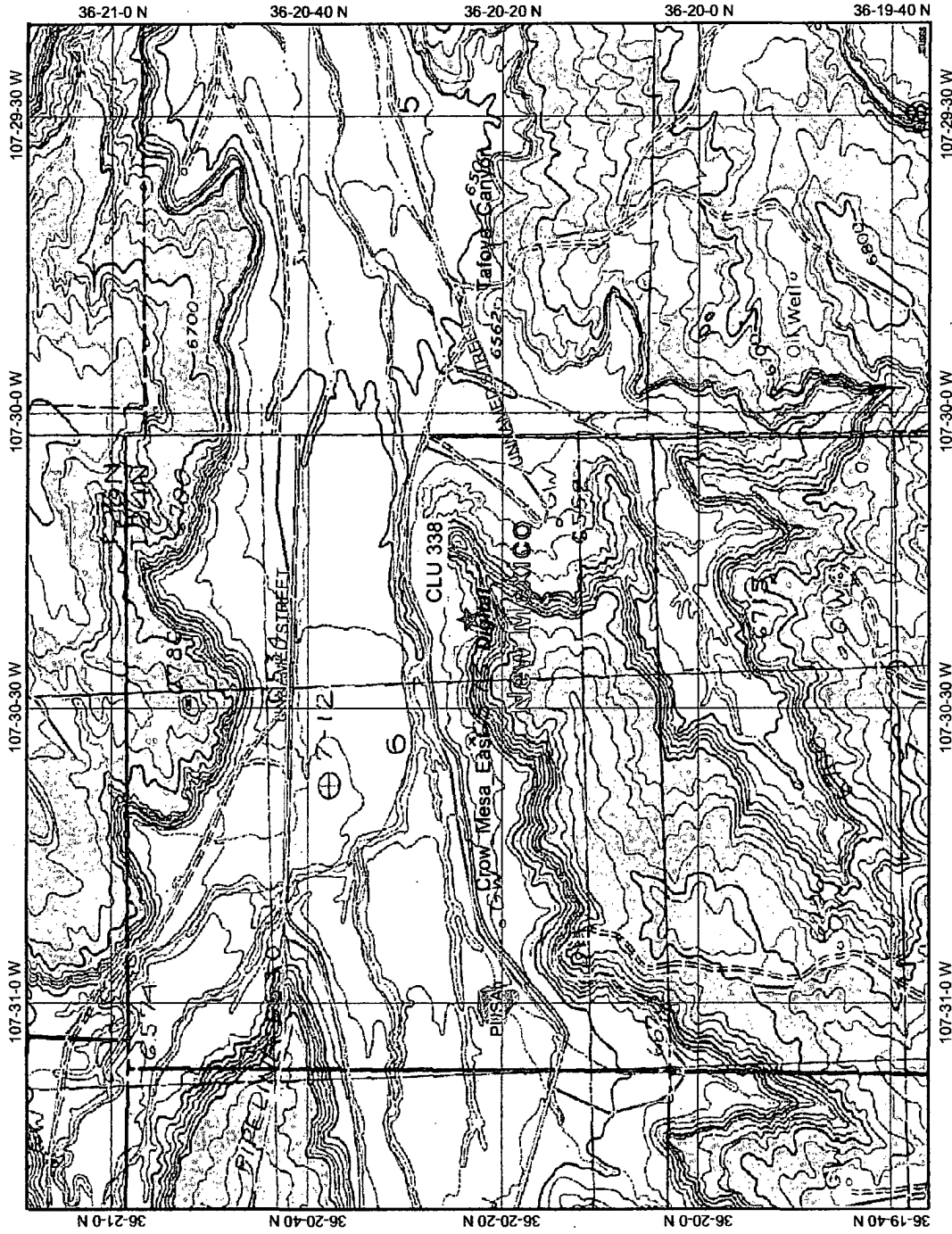
# Canyon Largo Project

30039234010000  
MERRION O&G CORP  
CANYON LARGO UNIT

338  
T24N R6W S6  
17,830  
441,903  
8,880



# CLU 338 USGS TOPO MAP



Map center: 36° 20' 22" N, 107° 30' 21" W

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.



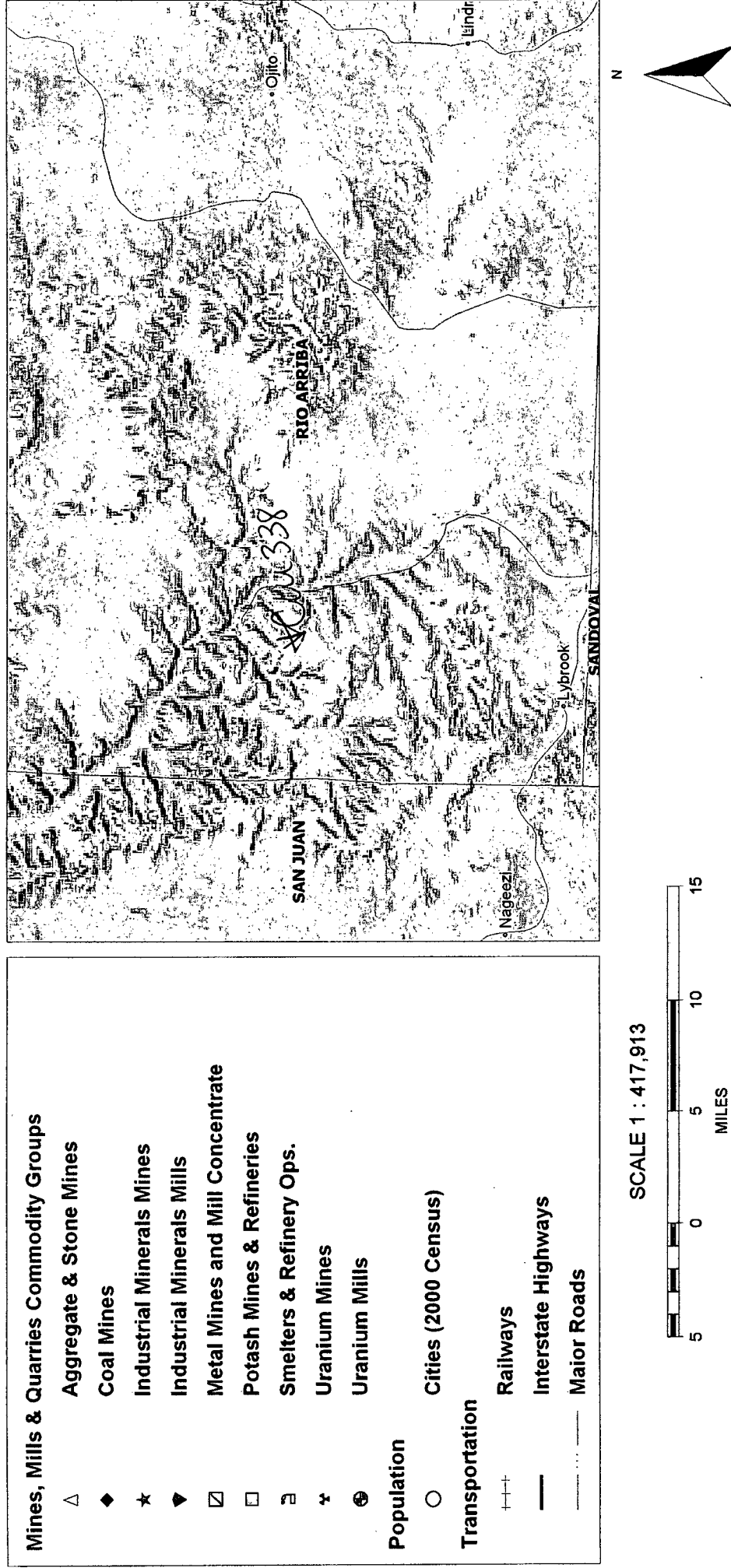
## Legend

- Ohio\_wet\_scan
  - 0
  - 1
  - Out of range
  - Interstate
  - Major Roads
  - Other Road
  - Interstate
  - State highway
  - US highway
  - Roads
  - Cities
- USGS Quad Index 24K
- Lower 48 Wetland Polygons
  - Estuarine and Marine Deepwater
  - Estuarine and Marine Wetland
  - Freshwater Emergent Wetland
  - Freshwater Forested/Shrub Wetland
  - Freshwater Pond
  - Lake
  - Other
  - Riverine
- Lower 48 Available Wetland Data
  - Non-Digital
  - Digital
  - No Data
  - Scan
  - NHD Streams
  - Counties 100K
  - States 100K
  - South America
  - North America

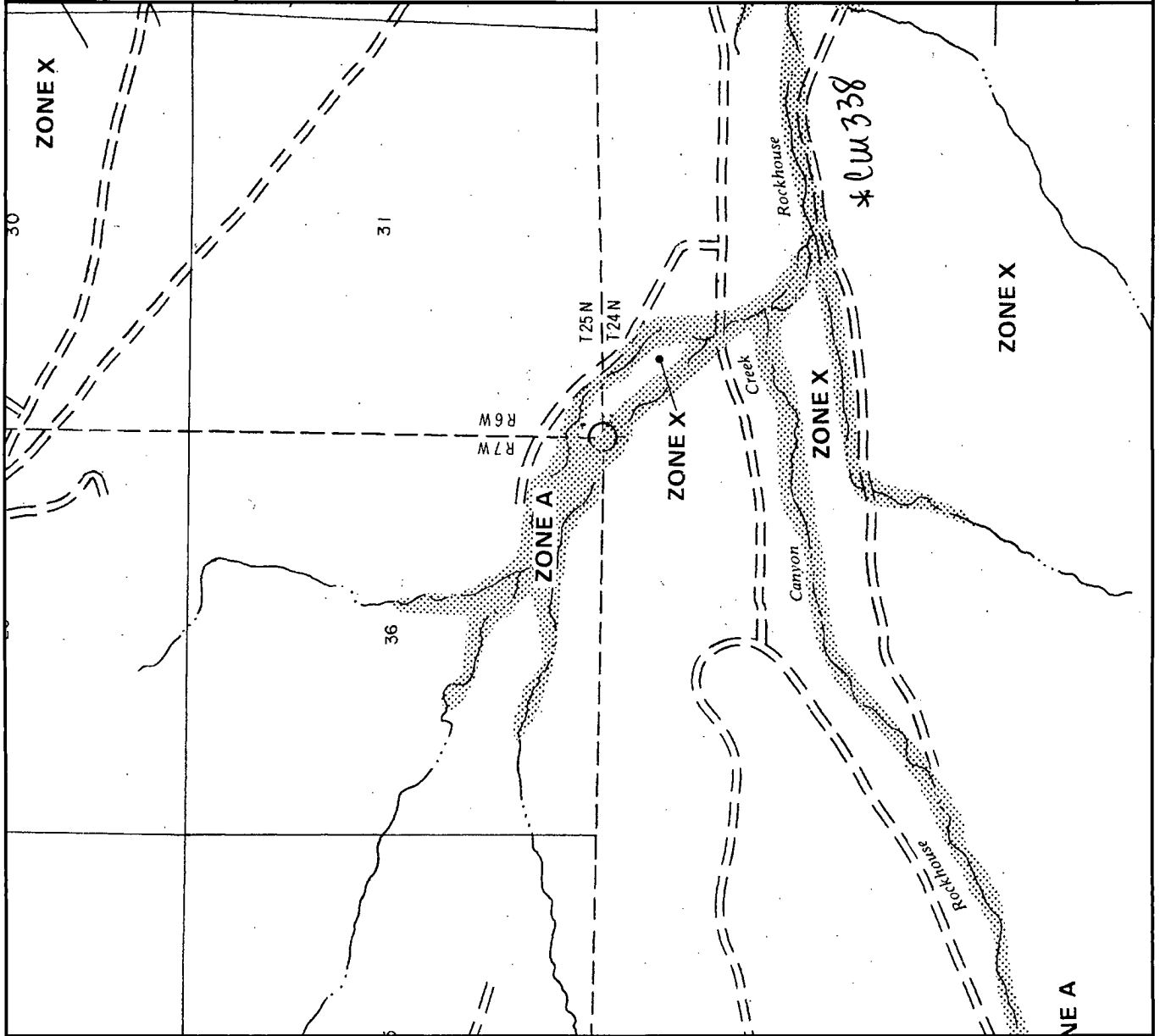
Scale: 1:20,000



# Canyon Largo Unit 338 Mines, Mills and Quarries Web Map



Canyon Largo Unit 338



APPROXIMATE SCALE



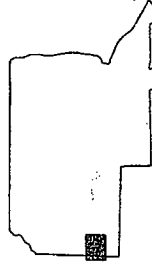
NATIONAL FLOOD INSURANCE PROGRAM

**FIRM**  
FLOOD INSURANCE RATE MAP

RIO ARriba COUNTY,  
NEW MEXICO  
UNINCORPORATED AREAS

PANEL 725 OF 1325

(SEE MAP INDEX FOR PANELS NOT PRINTED)



PANEL LOCATION

COMMUNITY-PANEL NUMBER  
350049 0725 B

EFFECTIVE DATE:  
JANUARY 5, 1989



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)

## ***Hydrogeological Report for Canyon Largo Unit #338***

### **Regional Hydrogeological Context:**

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

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

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

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



## **CLU 338**

### **Siting Criteria Compliance Demonstration & Hydro Geologic Analysis**

The subject well is not located in an unstable area. Visual inspection has been performed (see attached siting checklist): location is not within 300' of flowing watercourse or 200' from any other water course or lake bed; not within 300' of any permanent residence, school, institution; not within 500' of any private water well or spring. The topographic map confirms visual inspection of water course. FEMA Map confirms the location is not within a 100 year floodplain. The location is not over a mine and is not on the side of a hill, as indicated on the Mines, Mills and Quarries Map. iWaters search indicates the closest water column is Sec 24-24N-R6W SESW # SJ00681-14, Irrigation well, TD 127'. The closest water well is 3.6 miles, SJ 00681, Sec 21-25N-6W, 80'. Huntington Energy CLU 338 reported the top of San Jose water sand at 610', as demonstrated on attached log.

**HUNTINGTON ENERGY, L.L.C.**  
**BELOW GRADE TANK**  
**SITING/VISUAL INSPECTION CHECKLIST**

Well Name: CLU 338

Legal Location: SEC 6, T24N R6W

Date of Inspection: 4-2-09

Sitting Personnel: David Morales

I observed the following:

	<u>Yes</u>	<u>No</u>
A. 300 ft from flowing watercourse		X
B. 200 ft from any water course or lake bed		X
C. 300 ft from permanent resident, school, or institution		X
D. 500 ft from private fresh water well or spring used by less than 5 households for domestic or stock watering purposes.		X
E. 1000 ft from any other fresh water well or spring		X
F. Incorporated municipal boundaries or within a defined municipal fresh water well field.		X
G. Area overlaying a sub-surface mine		X
H. Unstable area		X
I. 100 year flood plain		X

All distances must be from the outer boundaries of the Section.

Operator <b>MERRION OIL &amp; GAS CORPORATION</b>			Lease <b>CANYON LARGO UNIT</b>		Well No. <b>338</b>
Init Letter <b>I</b>	Section <b>6</b>	Township <b>24N</b>	Range <b>6W</b>	County <b>Rio Arriba</b>	
Actual Footage Location of Well:					
1690 feet from the South line and		800 feet from the East line			
Ground Level Elev: <b>6560</b>	Producing Formation <b>Gallup</b>		Pool <b>Devils Fork Gallup</b>		Dedicated Acreage <b>160</b> Acres

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

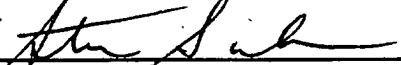

☐ Yes ☐ No If answer is "yes," type of consolidation \_\_\_\_\_

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) \_\_\_\_\_

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.

<b>RECEIVED</b> MAR 30 1984 OIL CON. DIV. DIST. 3		<b>RECEIVED</b> FEB 22 1984 BUREAU OF LAND MANAGEMENT FARMINGTON RESOURCE AREA	
Sec.	6	SF 078874	
		800'	
		1690'	

Scale: 1"=1000'

<b>CERTIFICATION</b>	
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.	
	
Name	Steve S. Dunn
Position	Operations Manager
Company	Merrion Oil & Gas Corp.
Date	1/12/84
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.	
Date Surveyed	December 29, 1983
Registered Professional Engineer and Land Surveyor	
	
Fred B. Kerr Jr.	
Certificate No.	3950

**Huntington Energy, L.L.C.**  
**Below Grade Tank Design and Construction**  
**San Juan Basin**

The design and construction requirements for below-grade tanks include the general provisions of Paragraphs A, C, D, and E of 19.15.17.11 NMAC and the specific requirements of Paragraph I of 19.15.17.11 NMAC. In accordance with Section 11 of 19.15.17 NMAC, the following include all of the appropriate provisions for the design and construction of below grade tanks (BGT) on Huntington Energy, L.L.C. (HE) locations.

General Plan:

1. HE will design and construct a BGT to contain liquids and to prevent contamination of fresh water and protect the public health and environment.
2. Huntington Energy, L.L.C. (HE) shall have signs at the sites as per 19.15.16.8 NMAC of which an existing well is the same operator-Huntington Energy. The sign shall provide the following: Operator's name, location of site by quarter-quarter or unit letter, section, township and range, and emergency numbers. If in case the Below Grade Tank (BGT) does not co-exist with an existing well, the sign shall comply with subsection C of 19.15.17.11 NMAC.
3. HE shall fence the BGT in a manner that prevents unauthorized access and shall maintain the fence in good repair. We shall ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site.

HE shall construct fencing around the BGT using 4' hogwire fencing topped with two strands of barbed wire, or with a pipe top rail- an alternative to the requirements as set out by Subsection D of 19.15.17.11 - and should provide long term protection and less maintenance. A six foot chain link fence topped with three strands of barbed wire will be used if the well location is within 1000' of a permanent residence, school, hospital, institution, or church.

4. HE will construct an expanded metal covering on the top of the BGT.
5. HE shall ensure that a below-grade tank is constructed of materials resistant to the below-grade tank's particular contents and damage from sunlight.
6. HE will construct a properly constructed foundation consisting of a firm, unyielding base, smooth and free of rocks, debris, sharp edges, or irregularities to prevent the liner's rupture or tear. Once the hole is constructed with a backhoe and firmed, shovels are used to smooth and remove all rocks, debris, or edges that might rupture the liner. In addition, I-beams placed below the tank are wrapped with 60 mil HPDE material to prevent any punctures of liner.
7. HE shall construct a BGT to prevent overflow and the collection of surface water run-on by constructing an inner crib, which the height extends above ground level by 6" preventing water from entering. The BGT is also elevated 6" above ground level as well. The berm, which is constructed approximately 3' tall by 5' wide for containment and any fluids entering outside of the fenced area. Auto shut-off controls are installed using a radar that is set at 14" of freeboard. When water level reaches that point, a signal is sent

and sends an alarm to the pumper. If 10" of freeboard is reached, a signal is sent to a valve which shuts the gas line on discharge of separator. This in turn causes a pressure increase to 200 psi, which closes the motor valve on the inlet side of the separator, shutting the well down. A manual valve is also placed on the 2" line from separator to BGT shutting off any water to BGT.

8. HE will construct a BGT system employing an external crib that stands between the wall of the foundation of the hole and the BGT. The crib will be placed on top of the 60 mil liner and will extend 6" above ground level. It is made of steel with a grey coating. The BGT side walls will be visible and open for visual inspection. Dirt is placed outside of crib filling void. (Liner is extended to ground level on outside of crib.)

The BGT will be steel and elevated 6" above underlying ground surface using 6" I-Beam (I-Beams wrapped to prevent edges from rupturing the liner), which elevates the BGT 6" above ground level to prevent surface run-on.

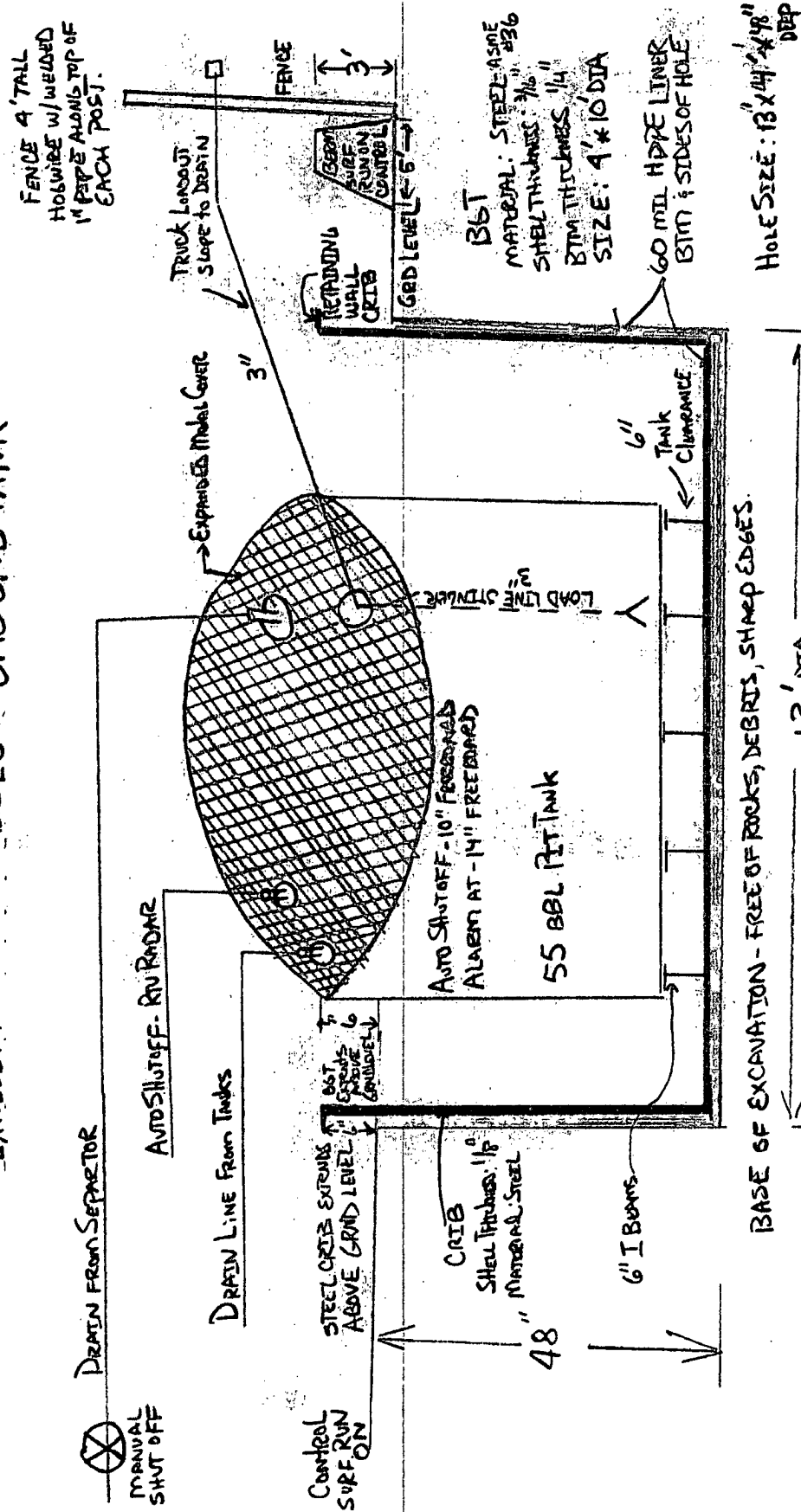
9. HE shall equip below-grade tanks designed in this manner with a properly operating automatic high-level shut-off control device and manual controls to prevent overflows. Auto shut-off controls are installed using a radar that is set at 14" of freeboard and when water level reaches that point, a signal is sent and it in turns sends an alarm to the pumper. If 10" of freeboard is reached, a signal is sent to a valve which shuts the gas line on discharge of separator. This in turn causes a pressure increase to 200 psi which closes the motor valve on the inlet side of separator shutting the well down. A manual valve is also placed on the 2" line from separator to BGT shutting off any water to BGT.
10. The geomembrane liner shall consist of 30-mil flexible PVC or 60-mil HDPE liner, or an equivalent liner material that the appropriate division district office approves. The geomembrane liner shall have a hydraulic conductivity no greater than  $1 \times 10^{-9}$  cm/sec. The geomembrane liner shall be composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. The liner material shall be resistant to ultraviolet light. Liner compatibility shall comply with EPA SW-846 method 9090A.

HE will demonstrate to the NMOCD that the liner complies with the specifications within Subparagraph (a) of Paragraph (4) of Subsection I of 19.15.17.11 NMAC and obtain approval from the NMOCD prior to the installation of the new design.

11. HE BGT's constructed and installed prior to June 16, 2008, that do not comply with 19.15.17.11 NMAC Paragraph 1-4 of Subsection I, shall be equipped or retrofitted or closed within 5 years after June 16, 2008. If the existing BGT does not demonstrate integrity, the BGT will be removed and a BGT that meets criteria set forth by Paragraphs 1 thru 4 of Subsection I of 19.15.17.11 NMAC will be installed.

EXHIBIT "A"

BELOW GROUND TANK



60 mil HDPE



Table 1.1: Minimum Values for Smooth Black-Surfaced HDPE Geomembranes

TESTED PROPERTY	TEST METHOD	FREQUENCY	MINIMUM VALUE				
Product Code			HDE 030A000	HDE 040A000	HDE 060A000	HDE 080A000	HDE 100A000
Thickness, (minimum average) mil (mm)	ASTM D 5199	Every roll	30 (0.75)	40 (1.00)	60 (1.50)	80 (2.00)	100 (2.50)
Lowest individual reading (-10%)			27 (0.69)	36 (0.91)	54 (1.40)	72 (1.80)	90 (2.30)
Density, g/cm <sup>3</sup>	ASTM D 1505	200,000 lb	0.94	0.94	0.94	0.94	0.94
Tensile Properties (each direction)	ASTM D 6693, Type IV	20,000 lb					
Strength at Break, lb/in (N/mm)	Dumbbell, 2 ipm		114 (20)	152 (27)	228 (40)	304 (53)	396 (69)
Strength at Yield, lb/in (N/mm)			69 (11)	84 (15)	126 (22)	168 (29)	216 (38)
Elongation at Break, %	G.L. 2.0 in (51 mm)		700	700	700	700	700
Elongation at Yield, %	G.L. 1.3 in (33 mm)		12	12	12	12	12
Tear Resistance, lb (N)	ASTM D 1004	45,000 lb	21 (93)	28 (125)	42 (187)	58 (249)	79 (349)
Puncture Resistance, lb (N)	ASTM D 4833	45,000 lb	54 (240)	72 (320)	108 (480)	144 (640)	180 (800)
Carbon Black Content, %	ASTM D 1603/4218	20,000 lb	2.0	2.0	2.0	2.0	2.0
Carbon Black Dispersion	ASTM D 5595	45,000 lb	+ Note 1	+ Note 1	+ Note 1	+ Note 1	+ Note 1
Notched Constant Tensile Load, hr	ASTM D 5367, Appendix	200,000 lb	300	300	300	300	300
REFERENCE PROPERTY	TEST METHOD	FREQUENCY	NOMINAL VALUE				
Oxidative Induction Time, min	ASTM D 3695, 200° C, O <sub>2</sub> 1 atm	200,000 lb	>100	>100	>100	>100	>100
Roll Length <sup>(1)</sup> (approximate), ft (m)			1,120 (341)	870 (265)	560 (171)	430 (131)	245 (74)
Roll Width <sup>(1)</sup> , ft (m)			22.5 (6.9)	22.5 (6.9)	22.5 (6.9)	22.5 (6.9)	22.5 (6.9)
Roll Area, ft <sup>2</sup> (m <sup>2</sup> )			25,200 (2,341)	19,575 (1,819)	12,600 (1,171)	8,675 (800)	5,513 (511)

Notes:

- +Note 1: Dispersion only applies to near spherical agglomerates. 9 of 10 views shall be Category 1 or 2. No more than 1 view from Category 3.
- GSG HD is available in rolls weighing about 3,900 lb (1,769 kg).
- All GSG geomembranes have dimensional stability of ±2% when tested with ASTM D 1204 and LTB of <77° C when tested with ASTM D 746.
- <sup>(1)</sup>Roll lengths and widths have a tolerance of ±1%.
- \*Modified.

**Huntington Energy, L.L.C.**  
**Below Grade Tank Operational Plan**  
**San Juan Basin**

The operation requirements for below-grade tanks include the general provisions of Paragraph A of 19.15.17.12 NMAC and the specific requirements of Paragraph E of 9.15.17.12 NMAC.

General Plan:

1. HE will operate and maintain a BGT to contain liquids and solids and prevent contamination of fresh water and protect public health and environment. Maintaining and operating all equipment in a satisfactory working order is accomplished by daily and monthly inspections to assure all systems are performing. These inspections should include: operations of equipment-functioning properly, observance of any surface run-on, checking for visible leaks, assure correct freeboard of liquids in BGT, berms integrity is good, fencing in compliance, assure no oil sludge, miscellaneous, expanded metal cover integrity is good, and all signs are in order.
2. HE shall construct a BGT to prevent overflow and the collection of surface water run-on by constructing an inner crib which the height extends above ground level by 6" preventing water from entering. The BGT is also elevated 6" above ground level as well as the berm constructed approximately 3' tall by approximately 5' wide for containment and any fluids entering outside of fenced area. Auto shut-off controls are installed using a radar that is set at 14" of freeboard and when water level reaches that point, a signal is sent and it in turns sends an alarm to the pumper. If 10" of freeboard is reached, a signal is sent to a valve which shuts the gas line on discharge of separator. This in turn causes a pressure increase to 200 psi which closes the motor valve on the inlet side of separator shutting the well down. A manual valve is also placed on the 2" line from separator to BGT shutting off any water to BGT.

Each lease operator gets a daily report containing water levels in each location. If auto shut-off control shuts well in, well is not opened until sufficient freeboard is reestablished and no alarms are activated. HE will maintain a 14" freeboard policy for alarm notification and a complete shut down when freeboard reaches 10" from top of BGT.

Berms will be maintained at 5' wide and 3' tall to assure prevention of surface run on and containment.

3. HE shall continuously remove any visible or measurable layer of oil from the fluid surface of a below-grade tank in an effort to prevent significant accumulation of oil over time.
4. HE monthly inspection report involves both lease operator and foreman reviewing each report monthly to assure integrity of the BGT system. This includes equipment functioning correctly, observance of any surface run-on, spills, or leak detection, check freeboard of liquids in BGT, berm integrity, all fencing in good condition, all gates in working condition, expanded metal cover in good condition, remove any visible layer of sludge from fluid level in tank, and document review on monthly gauge sheet of each



BGT system. If any issue arises, immediate action should commence to repair or replace in order to prevent any contamination of fresh water and protect public health and the environment.

5. If a BGT develops a leak, or if any penetration of the pit liner or BGT occurs below the liquid's surface, HE will remove all liquid above the damage or leak line within 48 hours. HE will notify the appropriate division district office within 48 hours of the discovery and repair the damage or replace the pit liner or BGT.

Existing BGT's installed prior to June 16, 2008, shall comply with Paragraph (1) through (4) of Subsection I of 19.15.17.11 NMAC. If existing BGT does not meet standards, HE will retrofit, remove or replace as per approved Exhibit "A" Design Drawing.

6. HE Operations Plan specifies that the auto shut-off system will send an alarm to HE lease operator and foremen when the freeboard liquid level is 14" from the top of BGT and the auto system will shut in system at 10" of freeboard. A manual valve is in place for complete shut down if needed.
7. HE standard operating procedures will comply with Subsection A of 19.15.17.12 NMAC in accordance with the following requirements:
  - 1) Operate and maintain BGT to contain liquids and maintain integrity of the liner, liner system and secondary containment (crib) to prevent contamination of fresh water and protect public health and environment. Daily and written monthly reviews will be executed to assure system is maintained and complies with all Division rules. Records will be kept a minimum of 5 years.
  - 2) HE shall not store or discharge any hazardous wastes into a BGT.

**Huntington Energy, L.L.C.**  
**Below Grade Tank Closure Plan**  
**San Juan Basin**

The closure requirements for below-grade tanks include the general provisions of Paragraphs A, G, H, I, J, and K of 19.15.17.13 NMAC and the specific requirements of Paragraph E of 9.15.17.13 NMAC.

Closure Timelines:

1. HE shall close an existing BGT within the time periods provided in 19.15.17.13 NMAC, or by and earlier date that the division requires because of imminent danger to fresh water, public health or the environment. HE will close an existing BGT 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 5 years after June 16, 2008, if not retrofitted to comply with Paragraph (1) through (4) of Subsection I of 19.15.17.11 NMAC.

HE shall close a permitted BGT within 60 days of cessation of the BGT's operation or As required by the provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan the Division District Office approves.

2. HE shall submit closure notice prior to the implementation of any closure operations to the Division District Office and surface owners. HE shall notify surface owners by certified mail, return receipt requested. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records shall be provided in the Closure Report. HE will notify the Division District office at least 72 hours, but not more than one week prior to any closure operation. All operator information shall include the operator's name and the location to be closed by unit letter, section, township and range. If associated with a particular well, the notice shall include the well's name, number and API number.

Closure Method & Procedures:

1. Remove liquids and sludge from a BGT prior to implementing a closure method. These will be disposed in facility IEI, Permit # 01001010B for sludge, and liquids will be disposed at the TNT Environmental, permit # NM 01-0008 or Basin Disposal, Inc., permit # NM-01-005 or Jillson SWD (Conoco-Phillips), R-10168.
2. HE will obtain prior approval from the OCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the final disposition of the BGT in the Closure Report.
3. All on-site related equipment with a BGT shall be removed unless equipments is required for some other purpose.
4. If the liner material requires disposal, HE will clean the liner (as per subparagraph (m) of paragraph (1) of Subsection C of 19.15.35.8 NMAC), and can be accepted at a solid waste facility at San Juan County Regional Landfill.
5. HE shall test the soils beneath the below-grade tank to determine whether a release has occurred. HE shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyze for BTEX, TPH and chlorides to.

demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 0.2mg/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 418.1 or other EPA method that the division approves, does not exceed 100 mg/kg; and the chloride concentration, as determined by EPA method 300.1 or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. HE shall notify the division of its results on form C-141.

6. If we determine a release has occurred, we will comply with 19.15.29 NMAC and 19.15.30 NMAC.
7. If sampling program demonstrates that 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, then HE shall backfill the excavation with compacted, non-waste earthen material, construct a division prescribed soil cover, and re-contour and re-vegetate the site, as per Subsection G, H and I of 19.15.17.13 NMAC.
8. Once HE has closed the BGT location, including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area, HE will then restore the surface are to prior conditions before operations as provided in Subsection H of 19.15.17.13 NMAC.
9. The soil cover for closure shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. HE will construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.
10. Re-vegetation: the first growing season after HE closes a BGT, HE shall seed or plant the disturbed area. HE shall accomplish seeding by drilling on the contour whenever practical or by other division-approved methods. HE shall obtain vegetative cover that equals 70% of the native perennial vegetative cover (unimpacted by overgrazing, fire or other intrusion damaging to native vegetation) consisting of at least three native pant species, including at lease one grass, but not including noxious weeds, and maintain the cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation. HE shall repeat seeding or planting until the required vegetative cover is achieved. HE shall notify the division when it has seeded or planted and when successful re-vegetation has occurred.
11. Closure Report: Within 60 days of closure, HE shall submit a closure report on form C-144/Checklist Box 24, with the following attachments: Proof of Closure Notice (surface owner and division); Proof of Deed Notice; Plot Plan, Confirmation Sampling Analytical Results (if applicable); Waste Material Sampling Analytical Results, Disposal Facility Name and Permit Number; Soil Backfilling and Cover Installation; Re-vegetation Application Rates and Seeding Technique; Site Reclamation (Photo Documentation); and Latitude and Longitude of site.