

# **Shell Exploration & Production**

State of New Mexico
Energy, Minerals and Natural Resources Dept.
Oil Conservation Division-District 4
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Attn.: Ed Martin, District Supervisor

Shell Exploration & Production Co.

Regulatory Affairs-EP Americas 4582 S. Ulster Street Parkway Suite 1400

Denver, Colorado 80237

March 19, 2012

Subject:

Notice of Completion Pit Closure and Interim Reclamation

Shell Exploration & Production Co., CD-1 (API No. 30-019-20134)

Guadalupe County, New Mexico

Dear Mr. Martin:

Shell Exploration & Production Company (Shell), as service provider to SWEPI LP in New Mexico, is submitting a Pit Closure Report (including Form C-144) to detail completion pit closure activities and interim reclamation conducted for the subject well, to New Mexico Oil Conservation Division-District 4 (OCD) for your review and approval.

If you have any questions or require any additional information regarding these reports, please contact me at (303) 222-6347, or David Janney at AMEC in Albuquerque at (505) 821-1801.

Regards,

Michael L. Bergstrom

Senior Regulatory Advisor

Shell Exploration & Production Company

Attachments: Completion Pit Closure Report

Miliail & Dergetro

Form C-144

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 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 August 1, 2011

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-Loon System Relow-Grade Tank or

<u>1 it, Closed-Loop System</u>	, Delow-Grade Talik, of	
Proposed Alternative Method Per	mit or Closure Plan Application	<u>l</u>
Modification to an existing permi	em, below-grade tank, or proposed alternativ	e method
Instructions: Please submit one application (Form C-144) per individ	dual 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 environment. Nor does approval relieve the operator of its responsibility to comply we have the operator of the complex of th	should operations result in pollution of surface wat ith any other applicable governmental authority's rul	er, ground water or the les, regulations or ordinances.
Operator: SWEPI LP	OGRID #: <u>250036</u>	
Address: P.O. Box 567, Houston, TX77001 (Local contact: Shell Explor. and	Prod. Co. 4582 S Ulster Pkwy., Suite 1400, Denve	er, CO 80237)
Facility or well name: <u>CD-1 (Completion Pit Closure)</u>		
API Number: 3001920134	OCD Permit Number:	-
U/L or Qtr/Qtr N Section 25 Township 11N	Range 23E County: Guadalupe	
Center of Proposed Design: Latitude 35.145866	Longitude <u>104,454973</u>	NAD: □1927 ⊠ 1983
Surface Owner: $\square$ Federal $\square$ State $\boxtimes$ Private $\square$ Tribal Trust or Indian Allot	ment	
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 □ □ String-Reinforced Liner Seams: □ Welded □ Factory □ Other  3. □ Closed-loop System: Subsection H of 19.15.17.11 NMAC  Type of Operation: □ P&A □ Drilling a new well □ Workover or Drilling intent) □ Drying Pad □ Above Ground Steel Tanks □ Haul-off Bins □ Other □ Lined □ Unlined Liner type: Thickness mil □ LLDPE Liner Seams: □ Welded □ Factory □ Other	Volume:bbl Dimensions: L	x Wx D
4.		
Below-grade tank:       Subsection I of 19.15.17.11 NMAC         Volume:	inch lift and automatic overflow shut-off	
5.  Alternative Method: Submittal of an exception request is required. Exception consideration of approval.		

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, institution or church)	hospital,
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
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)	
R.	
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.	
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 accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying above-grade tanks associated with a closed-loop system.	priate district pproval.
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

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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:	_
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	
Previously Approved Design (attach copy of design)  API Number:	
Previously Approved Operating and Maintenance Plan API Number:	
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)	_
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  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 Résponse 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	
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 - Temporary Completion Pit  Proposed Closure Method: Waste Excavation and Removal Temporary Completion Pit  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)	
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	

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13. Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if	D NMAC) more than two
facilities are required.  Disposal Facility Name: Disposal Facility Permit Number:	•
Disposal Facility Name: Disposal Facility Permit Number: 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 ser	
☐ Yes (If yes, please provide the information below) ☐ No	vice and operations?
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 NMA 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	C .
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 sour provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate disting considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	trict office or may be
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
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
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 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
<ul> <li>Within an unstable area.</li> <li>- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
18.  On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure pl 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	an. Please indicate,
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.  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	15.17.11 NMAC
Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC	ot be achieved)

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:
OCD Approval: Permit Application (including closure plan) Close	ure Plan (only) OCD Conditions (see attachment)
OCD Representative Signature:	Approval Date:
Title:	OCD Permit Number:
Closure Report (required within 60 days of closure completion): Subset Instructions: Operators are required to obtain an approved closure plan p. The closure report is required to be submitted to the division within 60 days section of the form until an approved closure plan has been obtained and t.	rior to implementing any closure activities and submitting the closure report. s of the completion of the closure activities. Please do not complete this he closure activities have been completed.
	☐ Closure Completion Date: 12/12/2010
22. Closure Method:  ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ A ☐ If different from approved plan, please explain.	Iternative Closure Method
two facilities were utilized.  Disposal Facility Name: Gandy-Marley, Inc. Tatum, NM  Disposal Facility Name:  Were the closed-loop system operations and associated activities performed   Yes (If yes, please demonstrate compliance to the items below)   Required for impacted areas which will not be used for future service and op  Site Reclamation (Photo Documentation)  Soil Backfilling and Cover Installation  Re-vegetation Application Rates and Seeding Technique	Disposal Facility Permit Number: NM-711-1-0020 Disposal Facility Permit Number: on or in areas that will not be used for future service and operations?
Proof of Closure Notice (surface owner and division) – Not applicable Proof of Deed Notice (required for on-site closure) – Not applicable Plot Plan (for on-site closures and temporary pits) – See Figure 2 of C Confirmation Sampling Analytical Results (if applicable) - See Apper Waste Material Sampling Analytical Results (required for on-site clos Disposal Facility Name and Permit Number - Included in Box 23 abo Soil Backfilling and Cover Installation - Description and Photo Docu Re-vegetation Application Rates and Seeding Technique - Described Site Reclamation (Photo Documentation) - See Appendix A of Closu On-site Closure Location: Latitude Longitud	Closure Report  Indix B of Closure Report
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure legistrian submitted with the closure complies with all applicable closure required.	sure report is true, accurate and complete to the best of my knowledge and uirements and conditions specified in the approved closure plan.
Name (Print): Michael L. Bergstrom	Title: Regulatory Advisor
Signature: Michael J. Dergstrom	Date: 3/19/20/2
e-mail address: Michael Bergstrom@shell.com	Telephone: 303.222.6347



November 3, 2011

Mr. Michael L. Bergstrom Shell Exploration & Production Co. 4582 S. Ulster Pkwy., Suite 1400 Denver, CO 80237

Subject:

CD-1 Gas Well Completion Pit Closure Report Webb and Hage Land and Cattle Company Lease

**Cuervo, Guadalupe County, New Mexico** 

Dear Mr. Bergstrom:

AMEC Environment and Infrastructure (AMEC) is submitting this closure report for the completion pit at the CD-1 natural gas well (API # 3001920134) located in Section 25; Township 11 N; Range 23 East of Guadalupe County, New Mexico (Figure 1): This wildcat gas well was completed and ready for flow testing by Cuervo Exploration on May 29, 2006. Shell Exploration & Production Co. (Shell) purchased the well in 2007 and assumed responsibility for pit closure. This report was prepared in accordance with guidelines published in New Mexico Administrative Code 19.15.17.13 and includes a brief description of the pit closure process, analytical results for the soil samples collected following liner removal, and backfilling and revegetation procedures.

### **SCOPE OF WORK**

The scope of work described below was conducted in accordance with the New Mexico Administrative Code 19.15.17.13 and the OCD guidance document *New Mexico Pit Closure Plan*. The scope of work for the pit closure included:

- · Removal of fluid and drilling mud from the lined pit;
- Removal of the HDPE pit liner;
- Transport, and disposal of drilling, completions, and flow-back fluids, drilling mud, and pit liner;
- Removal, transport, and disposal of approximately two feet of soil and rock from the bottom of the excavation that was incidental to the liner removal process;
- Collection, chloride field test kit and laboratory analysis of samples from the excavation bottom;

- Backfilling to grade and contouring with the surrounding topography; and
- Reporting the results of the closure in this report.

#### FIELD ACTIVITIES

Robinson Construction Group (Robinson) began removing the fluids and mud from the pit on November 17, 2010 (Appendix A, Photos 1-4). Robinson completed the removal of approximately 100 cubic yards of soil and rock beneath the liner on December 5, 2010 (Appendix A, Photo 5 and 6). Robinson removed approximately 5,300 barrels of fluids (222,600 gallons), 120 cubic yards of mud contained in the liner and 10 cubic-yards of soil/rock beneath the liner. Fluid was removed and transported in vacuum trucks and the mud, liner and soil/rock were transported in end dump trucks to the Gandy-Marley Inc. (GMI) oil-field waste disposal facility located in Tatum, New Mexico (facility ID # NM 711-1-0020) for proper disposal.

As the liner was being removed, no visible indications of a breech were observed in the liner. There were, however, two wet areas in the bedrock exposed in the northwest corner of the excavation bottom. Inspection of the excavation indicated that bedrock was exposed over the majority of the excavation bottom. The two wet areas were contained in depressions that were approximately 6-inches in width and approximately 9-feet long, parallel to one another and oriented northwest to southeast. The depressions appeared to be caused by the ripper teeth of the dozer used to construct the pit. The moisture did not appear to extend into the bedrock below the depressions.

On December 6, 2010, AMEC collected two single-point samples and a five-point composite soil sample from the bottom of the excavation after liner and soil/rock removal (Appendix A, Photos 7-12). The single-point samples were collected from each of the wet areas depicted on Figure 2. The five-point composite sample was collected from each corner and the center of the excavation. Mr. Ed Martin, with the New Mexico Oil Conservation Division (OCD), was on-site during the sampling event. Soil samples were placed into properly labeled 4-ounce glass sample jars and placed in a cooler with ice and transported under chain-of custody to Hall Analytical Laboratory (Hall) in Albuquerque, New Mexico. The samples were analyzed for diesel (DRO), gasoline (GRO) and motor oil range organics (MRO), benzene, toluene, ethyl benzene, xylenes, and chloride. In addition to submitting the samples for laboratory analysis, AMEC also removed 10 grams of soil from the five-point composite sample and analyzed it using the Hach "Quantab" Chloride Field Test Kits # 2744940 (Low Range 30-600 parts per million (ppm) CI) and # 2751340 (High Range 300-6000 ppm CI).

According to the Hach guidelines, the soil for field test kit analysis was placed into 100 milliliters of hot water for 90 minutes before reading the colorimetric strips. The Low-Range Quantab indicated the chloride concentration in the sample was 158 ppm and the Hi-Range Quantab indicated the chloride concentration was less than 400 ppm in each sample.

The chloride laboratory analytical results for each of the single-point samples were 7,100 and 5,700 ppm. The chloride laboratory analytical result for the five-point composite sample was 5,400 ppm. The laboratory analytical results are summarized in Table 1 and the laboratory analytical results package is included in Appendix B.

Based on these results, Mr. Martin agreed that fertilizer could be added to the wet areas to enhance biodegradation of residual petroleum. Mr. Martin also agreed that the rock in the bottom of the excavation could be ripped as much as practicable and clean soil from the stockpile mixed with ripped rock (mixed 3:1, clean soil:ripped rock), followed by backfilling with the remainder of the clean soil stockpile.

Shell added approximately 40 pounds of 13-13-13 (N-P-K fertilizer) to the wet areas and Robinson began the backfill and compaction operation. Robinson completed the backfill, compaction, and contouring on December 12, 2010. The contoured pit was not reseeded but it is intended to be reseeded in early 2012 (Appendix A, Photos 12-15). The expected application of the prescribed seed mix will be 8-12 pounds pure live seed per acre and it will be applied with a mechanical seed drill and as necessary hand broadcast in areas with restricted machinery access. The OCD Form C-144 is presented in Appendix C. Robinson returned the GMI disposal load tickets directly to SWEPI.

#### DISCUSSION

Bedrock with chloride concentrations above the regulatory limit of 1,000 ppm remained in place. All of the other analyte concentrations were below the regulatory limits. Bedrock in the bottom of the excavation was ripped as much as practicable, and mixed with clean soil from the stockpile. The remainder of the clay-rich, low permeability, clean soil stockpile was placed and compacted in the excavation. Based on drilling of five nearby water wells, depth to groundwater at the location is greater than 300 feet; therefore, the pit closure described above is protective of human health and the environment.

The initial Hach chloride field test kit results were not consistent with the chloride concentrations in the laboratory samples and the difference between the field test kit results and the laboratory results were greater than one order of magnitude. Chloride field test kit results for this location are suspect; possible due to the fine-grained materials (clay or mudstone) being analyzed.

#### LIMITATIONS

The scope of work for this report is intended to provide documentation of the CD-1 completion pit closure process in relation to the removal of fluid, mud, and soil/rock and is not intended to provide an assessment of the use of Hach chloride field test kits.

This work was performed in a manner consistent with that level of care and skill ordinarily exercised by other members of AMEC's profession practicing in the same locality, under similar conditions and at the date the services are provided. Any conclusions, opinions and recommendations are based on a limited number of

observations and data. It is possible that conditions could vary between or beyond the data evaluated. AMEC makes no other representation, guarantee or warranty, express or implied, regarding the services, communication (oral or written), report, opinion, or instrument of service provided.

Respectfully submitted,

**AMEC Environment and Infrastructure** 

Reviewed by:

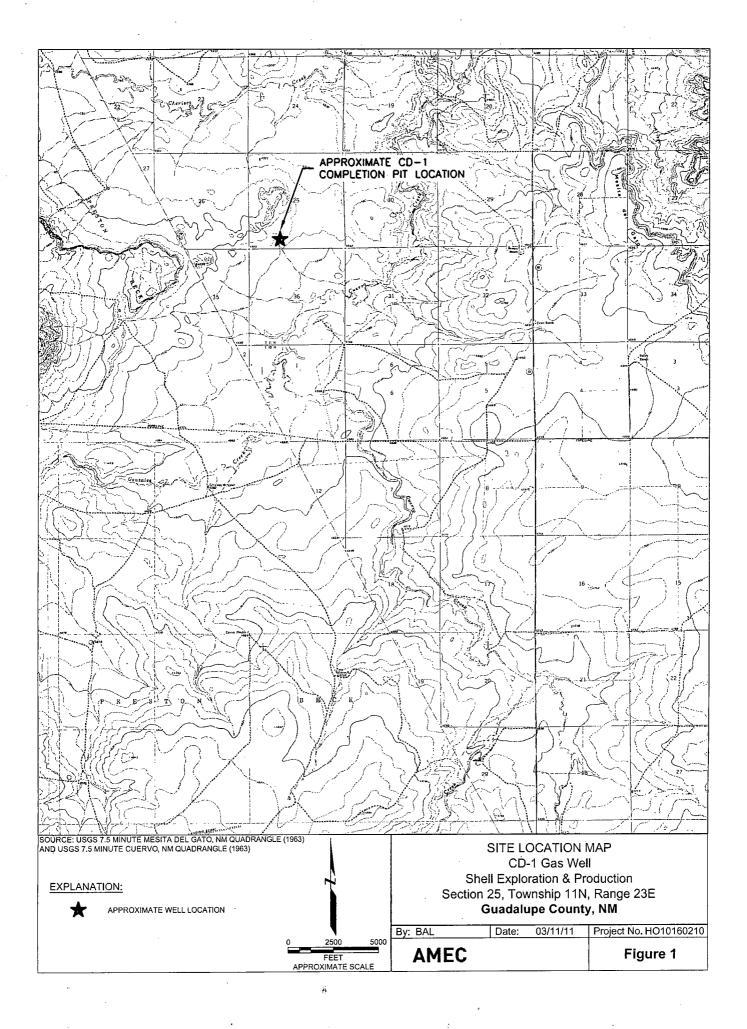
David Janney, PG

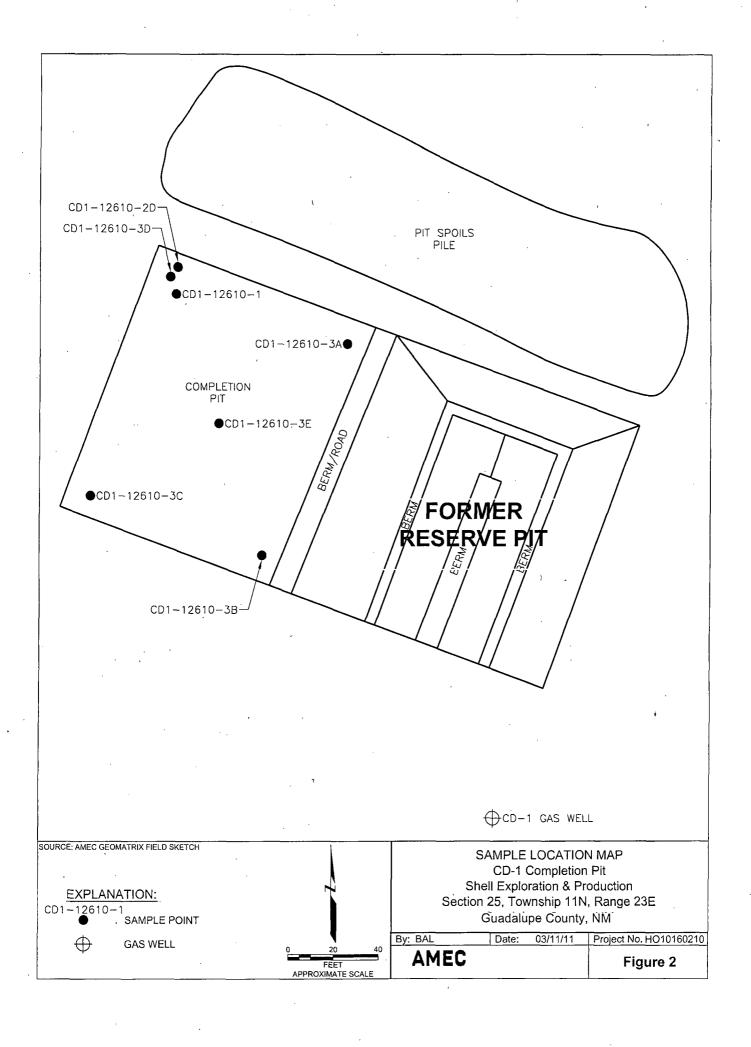
Project Manager

Dan Kwiecinski, PE

**Unit Manager** 

# FIGURES





# **TABLES**

API No. 3001920134

Table 1
CD-1 Completion Pit Analytical Summary
Guadalupe County, New Mexico

						Caracape county, item mexico	CAL HICKIES				
								Anions			
			Diesel Range	Motor Oil Range   Gasolir	Gasoline Range		Total Petroleum	(Chloride)	Chloride	Chloride	
Sample	Date		Organics EPA	organics EPA Organics EPA	Organics EPA	B, T, E, X (volatiles)	Hydrocarbons EPA   EPA Method	EPA Method	Hach Low- Hach High-	Hach High-	
Number	Collected	Matrix	Collected Matrix Method 8015B	Method 8015B	Method 8015B	EPA Method 8021B	Method 418.1	418.1	Range	Range	Comments
CD1-12610-1	12/6/10	soil	12	<50	<b>\$&gt;</b>	< 0.05, <0.05, <0.05, <0.05	<20	7,100	¥	ΑN	Northwest corner pit bottom in wet area
CD1-12610-2	12/6/10	soil	<10	<50	<b>\$&gt;</b>	< 0.05, < 0.05, < 0.05, < 0.05	<20	5,700	ΑN	Ą	Northwest corner pit bottom in wet area
CD1-12610-3	12/6/10	soil	15	<20	<5	< 0.05, <0.05, <0.05, <0.10	<20	5.400	158	<b>4</b> 00	Five point composite pit bottom

NOTES:
All concentrations are in militgrams per kilogram (mg/Kg)
B = Berzene
E = Ethyl berzene
NA = Not analyzed
T = Toluene
X = Xylenes

# APPENDIX A Photographic Log

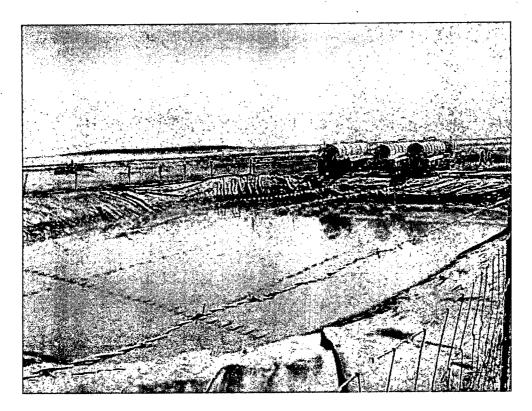


Photo 1: Removing fluid from the pit (looking southeast).

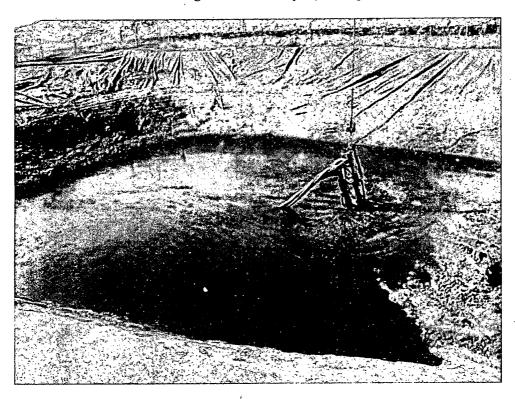


Photo 2: Removing fluid and mud from the pit (looking southwest).

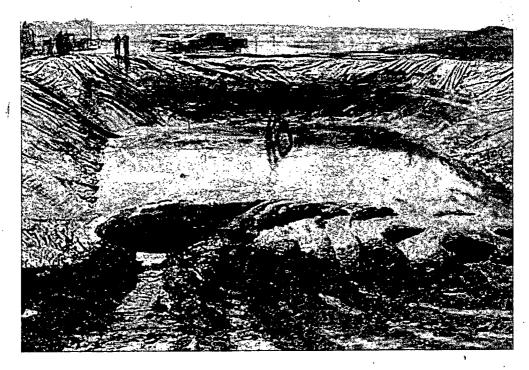


Photo 3: Removing mud from the pit (looking south).



§ Photo 4: Removing the pit liner (looking west).

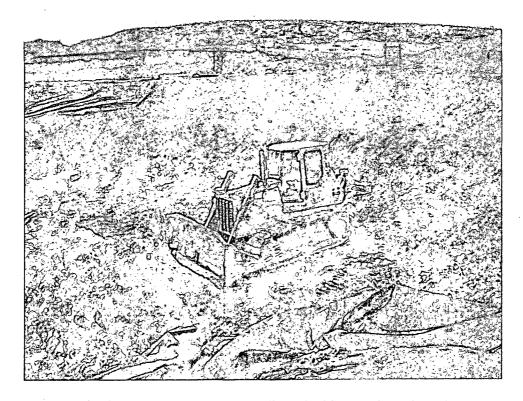


Photo 5: Removing the pit liner (looking northwest).



Photo 6: Rock and soil exposed in the excavation bottom ready for sampling (looking north).

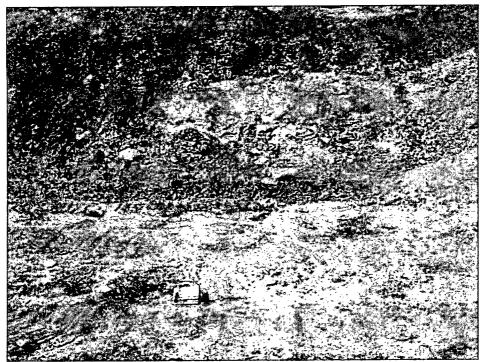


Photo 7: Sample point CD1-12610-1 (at clipboard) and CD1-12610-2 in background to right (looking west).



Photo 8: Sample point CD1-12610-3A (looking southwest).



Photo 9: Sample point CD1-12610-3B (looking southeast).



Photo 10: Sample point CD1-12610-3C (looking southwest).

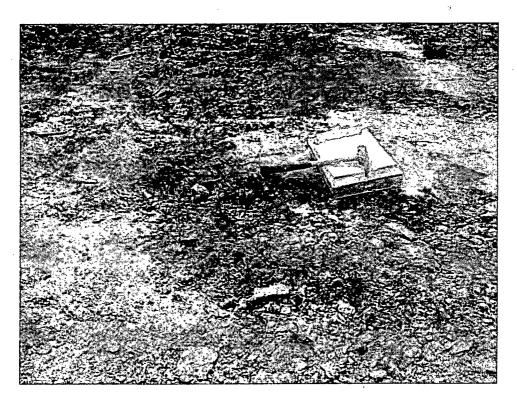


Photo 11: Sample point CD1-12610-3D (looking southeast).

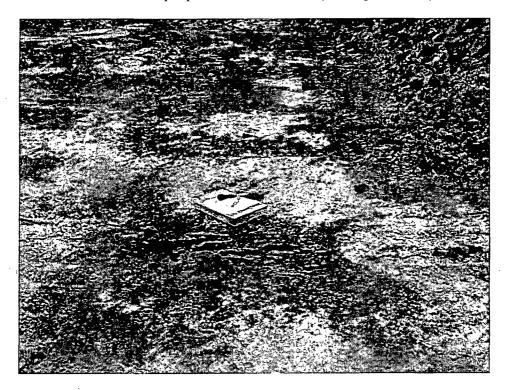


Photo 12: Sample point CD1-12610-3E (looking south).

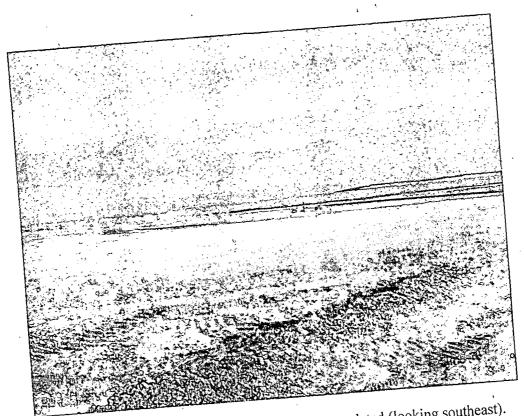


Photo 13: Backfill, compaction, and grading completed (looking southeast).

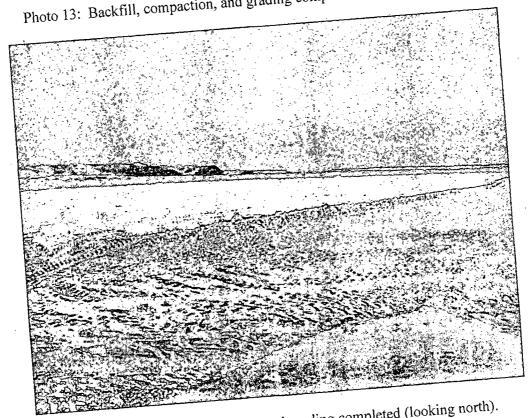


Photo 14: Backfill, compaction, and grading completed (looking north).

# APPENDIX B

Laboratory Analytical Results, QA/QC, and Chains-of-Custody



### COVER LETTER

Wednesday, December 08, 2010

David Janney AMEC 8519 Jefferson Street, NE Albuquerque, NM 87113

TEL: (505) 821-1801 FAX (505) 821-7371

RE: Shell Cuervo

Dear David Janney:

Order No.: 1012209

Hall Environmental Analysis Laboratory, Inc. received 3 sample(s) on 12/6/2010 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901 AZ license # AZ0682 ORELAP Lab # NM100001 Texas Lab# T104704424-08-TX



Date: 08-Dec-10

CLIENT:

**AMEC** 

Client Sample ID: CD1-12610-1

Lab Order:

1012209

Collection Date: 12/6/2010 11:40:00 AM

Project:

Shell Cuervo

Lab ID:

1012209-01

Date Received: 12/6/2010 Matrix: SOIL

Analyses	Result	PQL	Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	SE ORGANICS		<del></del>	. ,	Analyst: JB
Diesel Range Organics (DRO)	12	10	mg/Kg	1	12/7/2010 5:27:44 PM
Motor Oil Range Organics (MRO)	ND	50	mg/Kg	1	12/7/2010 5:27:44 PM
Surr DNOP	86.6	81.8-129	%REC	1	12/7/2010 5:27:44 PM
EPA METHOD 8015B; GASOLINE RA	ANGE	•			Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	12/7/2010 5:34:26 PM
Surr. BFB	101	89.7-125	%REC	1	12/7/2010 5:34:26 PM
EPA METHOD 300.0: ANIONS					Analyst: SRM
Chloride	7100	300	mg/Kg	200	12/8/2010 12:25:07 PM
EPA METHOD 8260B: VOLATILES S	HORT LIST				Analyst: MMS
Benzene	ND	0.050	mg/Kg	_1	12/7/2010 6:49:11 PM
Toluene	ND	0.050	mg/Kg	1	12/7/2010 6:49:11 PM
Ethylbenzene	ND	0.050	mg/Kg	1	12/7/2010 6:49:11 PM
Xylenes, Total	ND	0.10	mg/Kg	1	12/7/2010 6:49:11 PM
Surr: 4-Bromofluorobenzene	96.7	82.2-105	%REC	1 '	12/7/2010 6:49:11 PM
EPA METHOD 418.1: TPH			3		Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	12/8/2010

#### Qualifiers:

- Value exceeds Maximum Contaminant Level
- E Estimated value
- Analyte detected below quantitation limits
- Non-Chlorinated
- PQL Practical Quantitation Limit

- Analyte detected in the associated Method Blank
- Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
  - Spike recovery outside accepted recovery limits

Page 1 of 3

Date: 08-Dec-10

CLIENT:

**AMEC** 

Lab Order:

1012209

Cl. 11.C.

Project: Lab ID: Shell Cuervo

1012209-02

Client Sample ID: CD1-12610-2

Collection Date: 12/6/2010 11:46:00 AM

Date Received: 12/6/2010

Matrix: SOIL

Analyses	Result	PQL (	Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	SE ORGANICS		· · · · · · · · · · · · · · · · · · ·		Analyst: JB
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	12/7/2010 7:10:21 PM
Motor Oil Range Organics (MRO)	ND	50 ·	mg/Kg	1	12/7/2010 7:10:21 PM
Surr: DNOP	87.1	81.8-129	%REC	1	12/7/2010 7:10:21 PM
EPA METHOD 8015B: GASOLINE R	ANGE		•		Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	12/7/2010 6:03:22 PM
Surr: BFB	101	89 7-125	%REC	1	12/7/2010 6:03:22 PM
EPA METHOD 300.0: ANIONS				•	Analyst: SRM
Chloride	5700	300	mg/Kg	200	12/8/2010 12:42:32 PM
EPA METHOD 8260B: VOLATILES S	HORT LIST			•	Analyst: MMS
Benzene	. ND	0.050	mg/Kg	1	12/7/2010 8:13:03 PM
Toluene	ND	0.050	mg/Kg	1	12/7/2010 8:13:03 PM
Ethylbenzene	ND	0.050	mg/Kg	1	12/7/2010 8:13:03 PM
Xylenes, Total	ND	0.10	mg/Kg	1	12/7/2010 8:13:03 PM
Surr: 4-Bromofluorobenzene	99.9	82.2-105	%REC	1	12/7/2010 8:13:03 PM
EPA METHOD 418.1: TPH					Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	12/8/2010

### Qualifiers:

- Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

Page 2 of 3

Date: 08-Dec-10

CLIENT:

**AMEC** 

Lab Order:

1012209

Client Sample ID: CD1-12610-3

Collection Date: 12/6/2010 11:50:00 AM

Project:

Shell Cuervo

Date Received: 12/6/2010

Lab ID:

1012209-03

Matrix: SOIL

Analyses	Result	PQL (	Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	SE ORGANICS				Analyst: JB
Diesel Range Organics (DRO)	.15	10	mg/Kg	1	12/7/2010 7:44:28 PM
Motor Oil Range Organics (MRO)	ND	50	mg/Kg .	1	12/7/2010 7:44:28 PM
Surr: DNOP	87.8	81.8-129	%REC	1	12/7/2010 7:44:28 PM
EPA METHOD 8015B: GASOLINE RA	ANGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	12/7/2010 6:32:15 PM
Surr: BFB	102	89.7-125	%REC	1	12/7/2010 6:32:15 PM
PA METHOD 300.0: ANIONS					Analyst: SRN
Chloride	5400	150	mg/Kg	100	12/8/2010 12:59:57 PM
PA METHOD 8260B: VOLATILES S	HORT LIST				Analyst: MMS
Benzene	ND	0.050	mg/Kg	1	12/7/2010 8:41:00 PM
Toluene	ND	0.050	mg/Kg	1	12/7/2010 8:41:00 PM
Ethylbenzene	ND	0.050	mg/Kg	1	12/7/2010 8:41:00 PM
Xylenes, Total	ND	0.10	mg/Kg	1	12/7/2010 8:41:00 PM
Surr: 4-Bromofluorobenzene	98.5	82.2-105	%REC	1	12/7/2010 8:41:00 PM
PA METHOD 418.1: TPH					Analyst: <b>JB</b>
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	12/8/2010

#### Qualifiers:

- Value exceeds Maximum Contaminant Level
- Estimated value
- Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits

Date: 08-Dec-10

# QA/QC SUMMARY REPORT

Client:

**AMEC** 

Project: Shell Cuervo

Work Order:

1012209

Troject. Shell Caciv									WOIR	Order:	1012209
Analyte	Result	Units	PQL	SPK Va	I SPK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: A	nions					5			. D	105,0010	0.05 50 DI
Sample ID: MB-24775		MBLK				Batch ID:	24775	Analysi	is Date:	12/7/2010	6:U5:52 PN
Chloride	ND	mg/Kg	1.5			Batch ID:	24788	Anatysi	in Data:	12/8/2010 1	1.50.10 A
Sample ID: MB-24788	No	MBLK	4.5			Daton ID.	24/00	Analysi	S Date.	12/0/2010 1	1.50.19 Al
Chloride Sample ID: LCS-24788	ND	mg/Kg <i>LCS</i>	1.5			Batch ID:	24788	Analysi	s Date:	12/8/2010 1	2:07:43 PN
Chloride	14.74	mg/Kg	1.5	15	. 0	98.2	90	110			
Method: EPA Method 418.1: Ti					****						
Sample ID: MB-24772	- 11	MBLK				Batch ID:	24772	Analysi	s Date:		12/8/2010
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-24772		LCS				Batch ID:	24772	Analysi	s Date:		12/8/201
Petroleum Hydrocarbons, TR	88.68	mg/Kg	20	100	0	88.7	86.8	116			
Sample ID: LCSD-24772		LCSD				Batch ID:	24772	Analysi	s Date:		12/8/2010
Petroleum Hydrocarbons, TR	91.40	mg/Kg	20	100	0	91.4	86.8	116	3.02	16.2	
Method: EPA Method 8015B: D	iesel Range	Organics									
Sample ID: 1012209-01AMSD		MSD				Batch ID:	24771	Analysi	s Date:	12/7/2010	6:36:15 PN
Diesel Range Organics (DRO)	49.09	·mg/Kg	10	50	12.25	73.7	57.5	128	13.4	19.7	
Sample ID: MB-24771		MBLK				Batch ID:	24771	Analysi	s Date:	12/7/2010	3:10:15 PN
Diesel Range Organics (DRO)	ND	mg/Kg	10			*					
Motor Oil Range Organics (MRO)	ND	mg/Kg	50								
Sample ID: LCS-24771		LCS				Batch ID:	24771	Analysi	s Date:	12/7/2010	3:44:23 PN
Diesel Range Organics (DRO)	42.00	mg/Kg	10	50	. 0	84.0	66.2	120		40/7/0040	4 40 40 D4
Sample ID: LCSD-24771		LCSD				Batch ID:	24771	Analysi		12/7/2010	4:18:43 PN
Diesel Range Organics (DRO)	44.19	mg/Kg	10	50	0	88.4 Batch ID:	66.2	120 Analysi	5.08	14.3 12/7/2010 (	C.02:07 DN
Sample ID: 1012209-01AMS	56.40	MS	10	50	40.05		24771	Analysi	S Date.	12/1/2010 (	5,02.07 FN
Diesel Range Organics (DRO)	56.13	mg/Kg	10	50	12.25	87.8	57.5	128			
Method: EPA Method 8015B: G Sample ID: 1012209-01AMSD	iasoline Rar	nge MSD				Batch ID:	24767	Analysi	c Dote:	12/7/2010	7·20·50 DN
•	04.04			05	•						1,23.33 FN
Gasoline Range Organics (GRO) Gample ID: MB-24767	31.64	mg/Kg - <i>MBLK</i>	5.0	25	0	127 Batch ID:	69.2 <b>2476</b> 7	144 Analysi	1.01 s Date:	20.5 12/7/2010 8	8·27·38 PN
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0				24.4.	,		,	
Sample ID: LCS-24767	140	LCS	3.0			Batch ID:	24767	Analysi	s Date:	12/7/2010	7:58:49 PN
Gasoline Range Organics (GRO)	27.71	mg/Kg	5.0	25	ο	111	95.7	120			
iample ID: 1012209-01AMS	,	MS		_0	-	Batch ID:	24767	Analysi	s Date:	12/7/2010	7:01:08 PN
Basoline Range Organics (GRO)	31.96	mg/Kg	5.0	25	0	128	69.2	144			
			<del>-</del>		-	- <del>-</del>					

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E Estimated value

Page 1

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

Date: 08-Dec-10

# QA/QC SUMMARY REPORT

Client:

**AMEC** 

Project:

Shell Cuervo

Work Order:

1012209

Analyte	Result	Units	PQL	SPK Val S	PK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit Qual
Method: EPA Method 8260B: \	Volatiles Sho	ort List								
Sample ID: 1012209-01AMSD		MSD				Batch ID:	24767	Analysi	s Date:	12/7/2010 7:45:04 PM
Benzene	1.112	mg/Kg	0.050	1	0	111	62.3	118	2.59	20
Toluene	1.150	mg/Kg	0.050	1	0	115	76.4	120	2.27	12.5
Sample ID: mb-24767		MBLK				Batch ID:	24767	Analysi	s Date:	12/7/2010 6:21:16 PM
Benzene	ND	mg/Kg	0.050			•				
Toluene	ND	mg/Kg	0.050							
Ethylbenzene	ND	mg/Kg	0.050							
Xylenes, Total	ND	mg/Kg	0.10							
Sample ID: Ics-24767		LCS				Batch ID:	24767	Analysis	s Date:	12/7/2010 5:53:12 PM
Benzene	0.9713	mg/Kg	0.050	1	0	97.1	73.3	116		
Toluene	0.9731	mg/Kg	0.050	1	0	97.3	90.5	117		
Sample ID: 1012209-01AMS		MS				Batch ID:	24767	Analysis	s Date:	12/7/2010 7:17:08 PM
Benzene	1.141	mg/Kg	0.050	1	0	114	62.3	118		•
Toluene	1.176	mg/Kg	0.050	1	0	118	76.4	120		

Qualifiers:

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

Page 2

## Sample Receipt Checklist

Client Name AMEC	·	Date Receive	d:	12/6/2010
Work Order Number 1012209		Received by	: AMF	» /nn na
	121, 1	Sample ID la	abels checked by:	——— <del>[V</del>
Checklist completed by.	Date	(0		Initials
, (				
Matrix: Carrier n	ame: <u>Client drop-of</u>	<u>f</u>	*	,
Shipping container/cooler in good condition?	Yes 🗹	No 🗌	Not Present	
Custody seals intact on shipping container/cooler?	Yes 🔲	No 🗌	Not Present	Not Shipped ☑
Custody seals intact on sample bottles?	Yes 🗆	No 🗆	N/A ✓	_
Chain of custody present?	Yes 🗹	No 🗆		
Chain of custody signed when relinquished and received?	Yes 🗹	No 🗆		
Chain of custody agrees with sample labels?	Yes 🗹	No 🗆		
Samples in proper container/bottle?	Yes ☑	No 🗆		
Sample containers intact?	Yes 🗹	No 🗆		
Sufficient sample volume for indicated test?	Yes 🗹	No 🗆		
All samples received within holding time?	Yes ☑	No 🗆		Number of preserved
Water - VOA vials have zero headspace? No VOA vials	`	Yes 🗆	No 🗆	bottles checked for pH:
Water - Preservation labels on bottle and cap match?	Yes	No 🗆	N/A ☑	pri.
Water - pH acceptable upon receipt?	Yes 🗆	No 🗆	N/A 🗹	<2 >12 unless noted
Container/Temp Blank temperature?		<6° C Acceptab		below.
	-,-	If given sufficient		
COMMENTS:				
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Client contacted Date contacted:	. ·	Porc	on contacted	
Client contacted Date contacted:	, , , , , , , , , , , , , , , , , , ,		on comacted	and the control of th
Contacted by: Regarding:	,			of an in American contract contract of the con
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Corrective Action			,	

	HALL ENVIRONMENTAL ANALYSIS LABORATORY	www.hallenvironmental.com	4901 Hawkins NE - Albuquerque, NM 87109	Tel. 505-345-3975 Fax 505-345-4107	Analysis	()O°()	olDia	(Gss) (S (I) (I) (I) (I) (I) (I) (I) (I) (I) (I)	18.1 1.81 1.40 (HA (HA ()	d 4: d 5: d 5: d 5: d 5: d 5: d 5: d 5: d 5	TH + XHTHOCOMESTER HATTOCOMESTER (Methocomester Hattocomester Hattocomes								Remarks.	posite each of t	e derock removing angoot,	If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.
Turn-Around Time:	□ Standard X Rush ZY hr	Project Name:	Shell Cueryo	roject#:	H018160210,4	Project Manager:	(808)	Joursey Jid Thomas	EXes TONO	Samples Temperature: 8°C	Preservative FEALIND  Type	4029/055 None	7 2	11 11 2					Received by:	12/6/10 1630	eceived by Date Time One	I racted to other accredited laboratories. This serves as notice of this possibi
Chain-of-Custody Record			Mailing Address TE From NE	1 87113	Phone #: 505 , 821, 1801	avid sauney Damaicon	OA/QC Package:		□ NELAP □ Other	Of EDD (Type) とがらで/	Date Time Matrix Sample Request ID	126/16 1140 Sail CO1-12610-1		11 1150 11 (0)-12610-3					Date: Time: Relinquished by:	o 1630 Dare Hermey	Date: Time: Relinquish of by: R.	If necessary, samples submitted to Hall Environmental may be subcontr

# APPENDIX C OCD Form C-144