

..Submit 3 Copies To Appropriate District
Office
District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Ave., Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources

Form C-103
May 27, 2004

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

WELL API NO. 30-007-20871
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name VPR A
8. Well Number 437
9. OGRID Number 180514
10. Pool name or Wildcat Stubblefield Canyon - Vermejo

SUNDRY NOTICES AND REPORTS ON WELLS
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A
DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH
PROPOSALS.)

1. Type of Well: Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other Coalbed Methane
2. Name of Operator EL PASO E & P COMPANY, L.P.
3. Address of Operator PO BOX 190, RATON, NM 87740

4. Well Location Unit Letter B : 1305 feet from the North line and 1665 feet from the East line Section 33 Township 31N Range 20E NMPM Colfax County	11. Elevation (Show whether DR, RKB, RT, GR, etc.) 8,060' (GL)
Pit or Below-grade Tank Application <input type="checkbox"/> or Closure <input type="checkbox"/>	
Pit type _____ Depth to Groundwater _____ Distance from nearest fresh water well _____ Distance from nearest surface water _____	
Pit Liner Thickness: _____ mil Below-Grade Tank: Volume _____ bbls; Construction Material _____	

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO: PERFORM REMEDIAL WORK <input type="checkbox"/> PLUG AND ABANDON <input type="checkbox"/> TEMPORARILY ABANDON <input type="checkbox"/> CHANGE PLANS <input type="checkbox"/> PULL OR ALTER CASING <input type="checkbox"/> MULTIPLE COMPL <input type="checkbox"/> OTHER: Recompletion <input checked="" type="checkbox"/>	SUBSEQUENT REPORT OF: REMEDIAL WORK <input type="checkbox"/> ALTERING CASING <input type="checkbox"/> COMMENCE DRILLING OPNS. <input type="checkbox"/> P AND A <input type="checkbox"/> CASING/CEMENT JOB <input type="checkbox"/> OTHER:
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13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work).
SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

1. MIRU Animas Well Service. PU Rods, Tubing, Production Equipment.
2. MIRU Weatherford and Halliburton and Perforate and Stimulate the following Raton Coal Intervals:
Stage 1 - 1829'-1833', 1893'-1899', 1908'-1912' 56 Holes
Acidize the perforations, pump 70 Quality Nitrogen foam with mesh sand.
3. MIRU Completion Unit.
4. Turn well over to the Production Supervisor and run pump, tubing, and rods. Test well and put back on production.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that any pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐ or an (attached) alternative OCD-approved plan ☐.

SIGNATURE Shirley Mitchell TITLE Regulatory Analyst DATE 11/19/2008
Type or print name **Shirley A Mitchell** E-mail address: **shirley.mitchell@elpaso.com** Telephone No. **(505) 445-6785**
For State Use Only

APPROVED BY: Ed Martin TITLE **DISTRICT SUPERVISOR** DATE 12/4/08
Conditions of Approval (if any):

District I
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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 CLEZ
July 21, 2008

For closed-loop systems that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, submit to the appropriate NMOCD District Office.

Closed-Loop System Permit or Closure Plan Application

(that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

Type of action: ☒ Permit ☐ Closure

Instructions: Please submit one application (Form C-144 CLEZ) per individual closed-loop system request. For any application request other than for a closed-loop system that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, please submit a Form C-144.

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: EL PASO E & P COMPANY, L.P. OGRID #: 180514
Address: PO BOX 190 RATON, NEW MEXICO 87740
Facility or well name: VPR A 437
API Number: 30-007-20871 OCD Permit Number: _____
U/L or Qtr/Qtr B Section 33 Township 31N Range 20E County: Colfax
Center of Proposed Design: Latitude N 36 52 54.6 Longitude W 104 48 55.9 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☐ State ☒ Private ☐ Tribal Trust or Indian Allotment

2.
☒ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Operation: ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent) ☐ P&A
☒ Above Ground Steel Tanks or ☐ Haul-off Bins

3.
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

4.
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.
☒ 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 Box 5) - 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: _____

5.
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: VPR A 500 WDW (Water) Disposal Facility Permit Number: API 30-007-20892
Disposal Facility Name: Midway Landfill - Pueblo, Colorado (Frac Sand) Disposal Facility Permit Number: Case # CD-89-003
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

6.
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): Shirley A. Mitchell Title: Sr. Regulatory Analyst
Signature: Shirley Mitchell Date: 11/21/2008
e-mail address: shirley.mitchell@elpaso.com Telephone: 575 445-6785

7. **OCD Approval:** ☒ Permit Application (including closure plan) ☐ Closure Plan (only)

OCD Representative Signature: Ed Martin

Approval Date: 12/4/08

Title: DISTRICT SUPERVISOR

OCD Permit Number: _____

8. **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: _____

9. **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: API

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

10. **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: _____

**FORM C-144 CLEZ ATTACHMENT
EL PASO E & P COMPANY, L.P.
RATON BASIN
ABOVE GROUND STEEL TANKS**

Closed-Looped Design Plan

In accordance with Rule 19.15.17 NMAC, the following describes the design of a closed-looped system for El Paso E & P Company, L.P. The following describes El Paso E & P Company's standard procedures for a closed-looped system; a separate plan will be submitted for any closed-loop system, which does not conform to this plan.

El Paso E & P Company's closed-loop system will not require a drying pad, temporary pit, below grade tank or a sump. It will include an above ground steel tank suitable for holding the solids and fluids for rig operations. The tank will be of sufficient volume to maintain a safe free board between disposal of the liquids and solids from the rig operations.

- Fencing is not required for an above ground closed-loop system.
- El Paso E & P Company will post a well sign in compliance with 19.15.3.103 NMAC.
- El Paso E & P Company will place a frac tank on location to store fresh water.

Operating and Maintenance Plan (O & M)

El Paso E & P Company's closed-loop system will be operated and maintained to contain liquids and solids to prevent contamination of fresh water sources, to protect public health, and the environment. El Paso E & P Company's O & M plan will include the following steps:

- El Paso E & P Company, will vacuum out the liquids, which will be disposed At one of our nearest Salt Water Disposals located on the Vermejo Park Ranch.
- Solids in the closed-loop tank will be vacuumed out, stored in 55 gallon drums at the mine Warehouse yard, and hauled off by Waste Management, to the Midway Landfill, Pueblo, Colorado ,Case Number CD-89-003, (Certificate attached)
- No hazardous waste, miscellaneous solid waste, or debris will be stored in the tank. Only fluids or cuttings, used or generated by rig operations, will be placed or stored in the tank.
- El Paso E & P Company will notify the Santa Fe District Office within 48 hours, if a discovery of the closed-loop system's integrity is compromised in any way. Upon a discovery of a compromised tank, repairs will be made immediately.
- During rig operations, a daily inspection will be conducted, which will be logged, signed, and dated.

Closure Plan

The closed-loop system will be hauled off within 60 days of completion, and in accordance with Subsection D of 19.15.17.13. This will be done by transporting the liquids to the nearest Salt Water Disposal on the Vermejo Park Ranch; and the solids will be transported by Waste Management to the Midway Landfill. The tank will be removed from the location as part of the rig mob. If any equipment is set off location, El Paso E & P Company will re-seed the disturbed area. Also as part of the abandonment of the well, the location will be re-contoured and re-vegetated to pre-existing conditions when possible.

~~—(Steel Tank Design and Photos attached)—~~