

Bopco, L.P.

522 W. Mermod, Suite 704
Carlsbad, NM 88220

Office: (575)887-7329
Fax: (575)887-7473

Thursday, August 07, 2014

Attn: Mike Bratcher

Environmental Specialist
New Mexico Oil Conservation Division, District II
811 S. First St.
Artesia, NM 88210

RE: Form C-103 Subsequent Report of Remedial Work
Big Eddy Unit #44 Battery #1
Unit Letter H, Section 16, T21S, R30E

Mr. Bratcher:

This is a summary of activities during the final reclamation of the BEU #44 Battery #1, and a request for approval of the associated NMOCD Form C-103. Bopco retained Merrymen Construction to reclaim the site located within the Maroon Cliffs of Eddy County, south of highway 62/180 east of Carlsbad, NM.

Summary of Activities

On April 14, 2014, surface samples were collected from throughout the location to confirm areas of chloride impact following P&A activities at the site. The samples were field screened for chloride. A representative range of these samples was submitted to a commercial laboratory for chloride analysis. Chloride was concentrated in the center west area of the pad (Figure 1).

On May 12, 2014, removal of the well pad began. As excavation progressed, the soils were field screened for chloride and samples were submitted to a laboratory for analysis. Chloride impacted soils were removed to a NMOCD approved disposal facility. Remaining soils contained not more than 1100 mg/kg chloride (Figure 2).

A small area of oil stain was also discovered in the northeast corner of the site in the former location of a compressor (Figure 3). A sample trench was excavated in the center, and a composite sample was collected from the excavated stockpile. The composite sample was submitted to a laboratory for waste characterization with the purpose of verifying that the material could be removed to Lea Land disposal facility. A sample from the trench was collected at 6 ft below ground surface (bgs) and another at 10 ft bgs. These samples were submitted to the lab for Total Petroleum Hydrocarbon (TPH) analyses to verify the depth of impact at this site. The 10 ft sample was below the method minimum detection level, and the area was excavated to 10 ft bgs. Side wall samples of the excavation were submitted to a laboratory for TPH analyses, and these samples were also below the minimum detection level. Upon laboratory confirmation, impacted soils in this area were removed to Lea Land disposal facility. Surface caliche removed from the east side of the well pad and not impacted by chloride was used to backfill a portion of the compressor site excavation.

The site was leveled and 18 inches of clean topsoil was imported and placed on the surface of the central and west areas of the site. A former reserve pit sloping upward at the north of the pad showed

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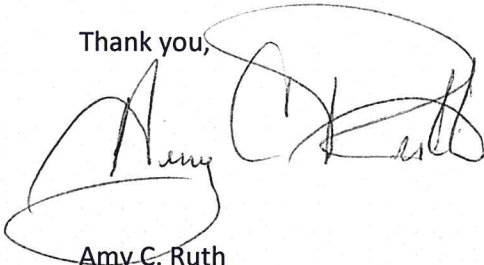
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signs of erosion on the surface as well as some exposed plastic at the east and west ends. The topsoil cap was extended to the north to include the reserve pit. The topsoil along the entire capped area of the former reserve pit and over the rest of the former well pad was contoured for erosion control and water diversion (Figure 4).

Existing trenches formerly positioned for water erosion control located north of the entire site were repaired. Photo documentation is included in the attachments. The entire site was reseeded with a Bureau of Land Management #2 seed mix, and the south east perimeter was fenced to prevent recreational traffic disturbance to the reclaimed area.

Bopco respectfully requests your review of the site and approval of the enclosed NMOCD Form C-103 Subsequent Report of Remedial Work. Site diagrams, laboratory reports, and photographs are also enclosed for your review. Please call Tony Savoie at 432-556-8730 or myself at the number below if you have any questions or concerns.

Thank you,

A handwritten signature in black ink, appearing to read 'Amy C. Ruth', is written over a large, loopy circular scribble.

Amy C. Ruth
EH&S Remediation Specialist
Bopco, L.P.
Mobile: (432)661-0571

Attachments: FIGURE 1 – Site Diagram of Initial Sampling April 14, 2014
FIGURE 2 – Site Diagram with Chloride Results
FIGURE 3 – Site Diagram of Compressor Site
FIGURE 4 – Site Diagram of Overall Areas of Reclaim
Laboratory Reports
Photo Documentation

FIGURE 1: Big Eddy Unit 44 Battery #1 Initial Sampling – April 14, 2014
Unit Letter H, Section 16, Township 21S, Range 30E

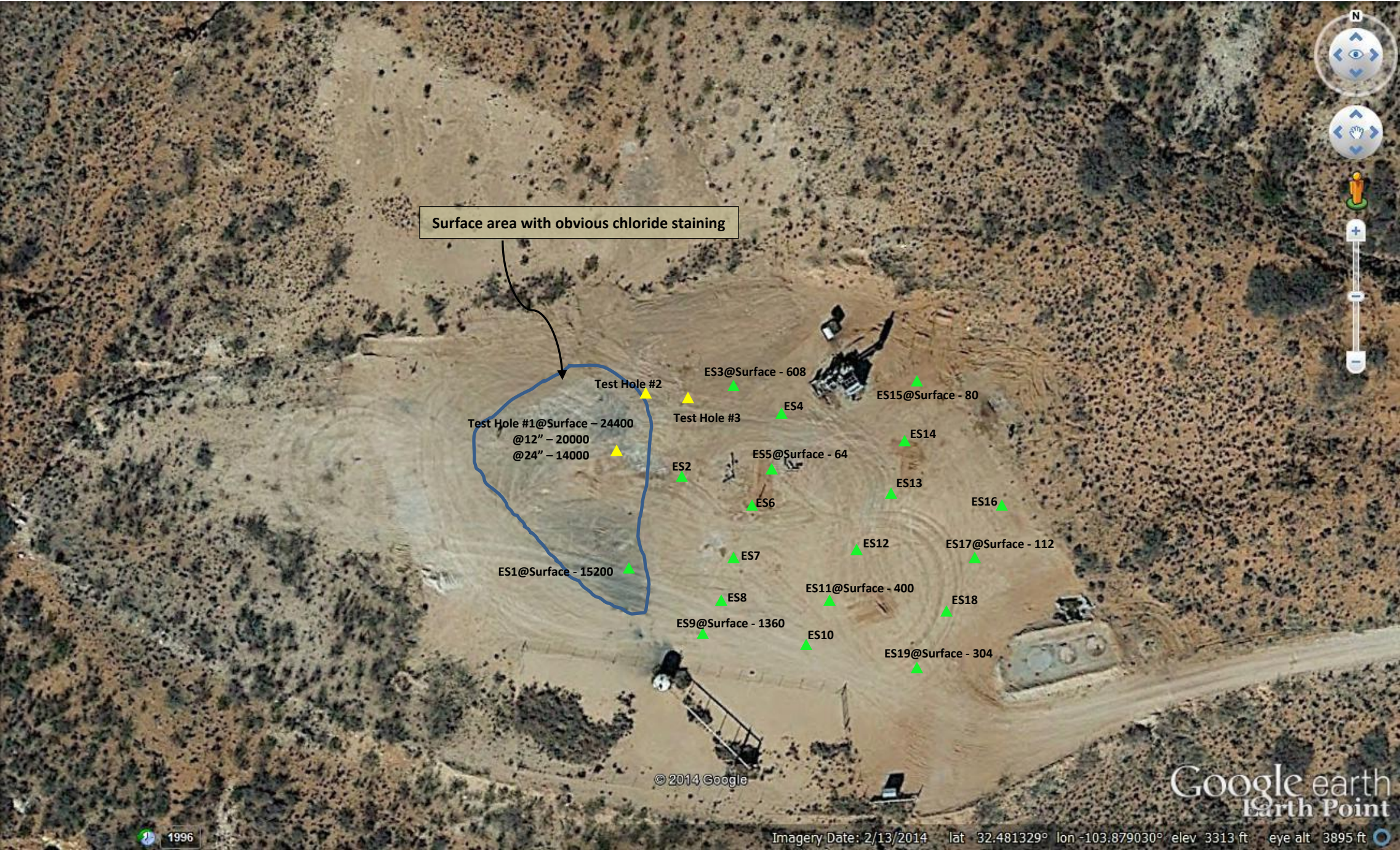


FIGURE 2: Big Eddy Unit 44 Battery #1 Final Reclamation Chloride Results

Unit Letter H, Section 16, Township 21S, Range 30E

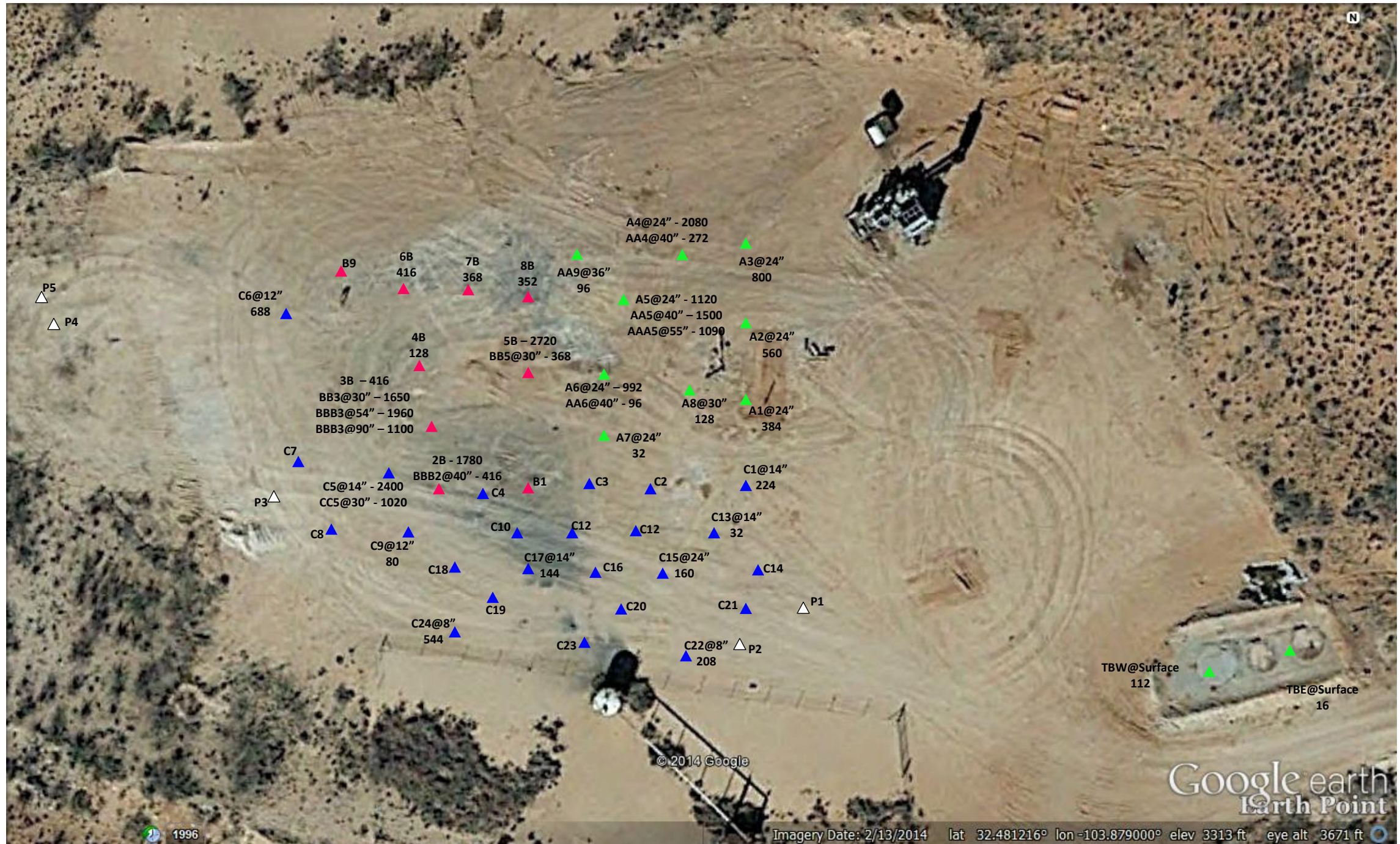


FIGURE 3: Big Eddy Unit 44 Battery #1 Compressor Site
Unit Letter H, Section 16, Township 21S, Range 30E

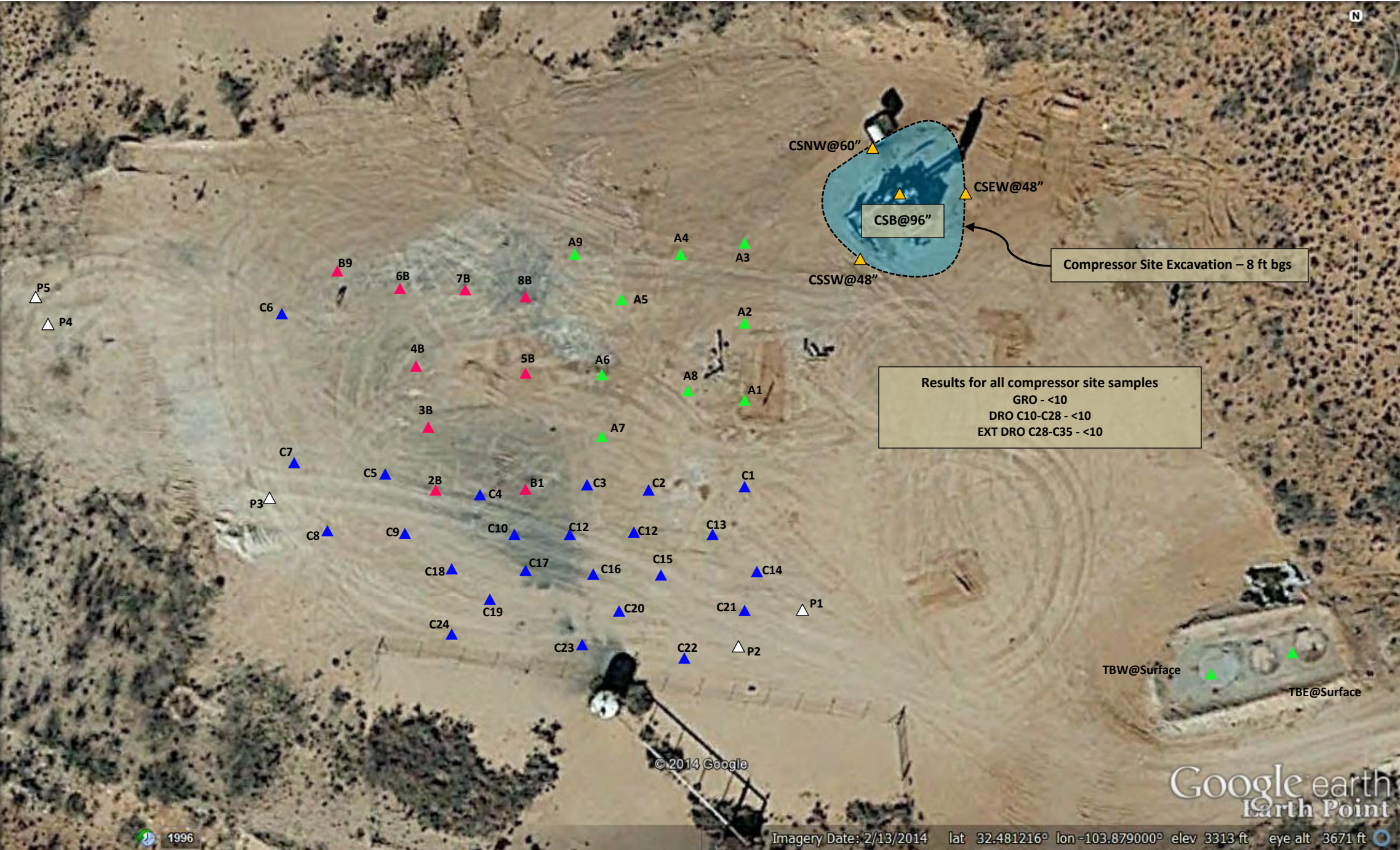


FIGURE 4: Big Eddy Unit 44 Battery #1 Overall Areas of Reclaim

Unit Letter H, Section 16, Township 21S, Range 30E

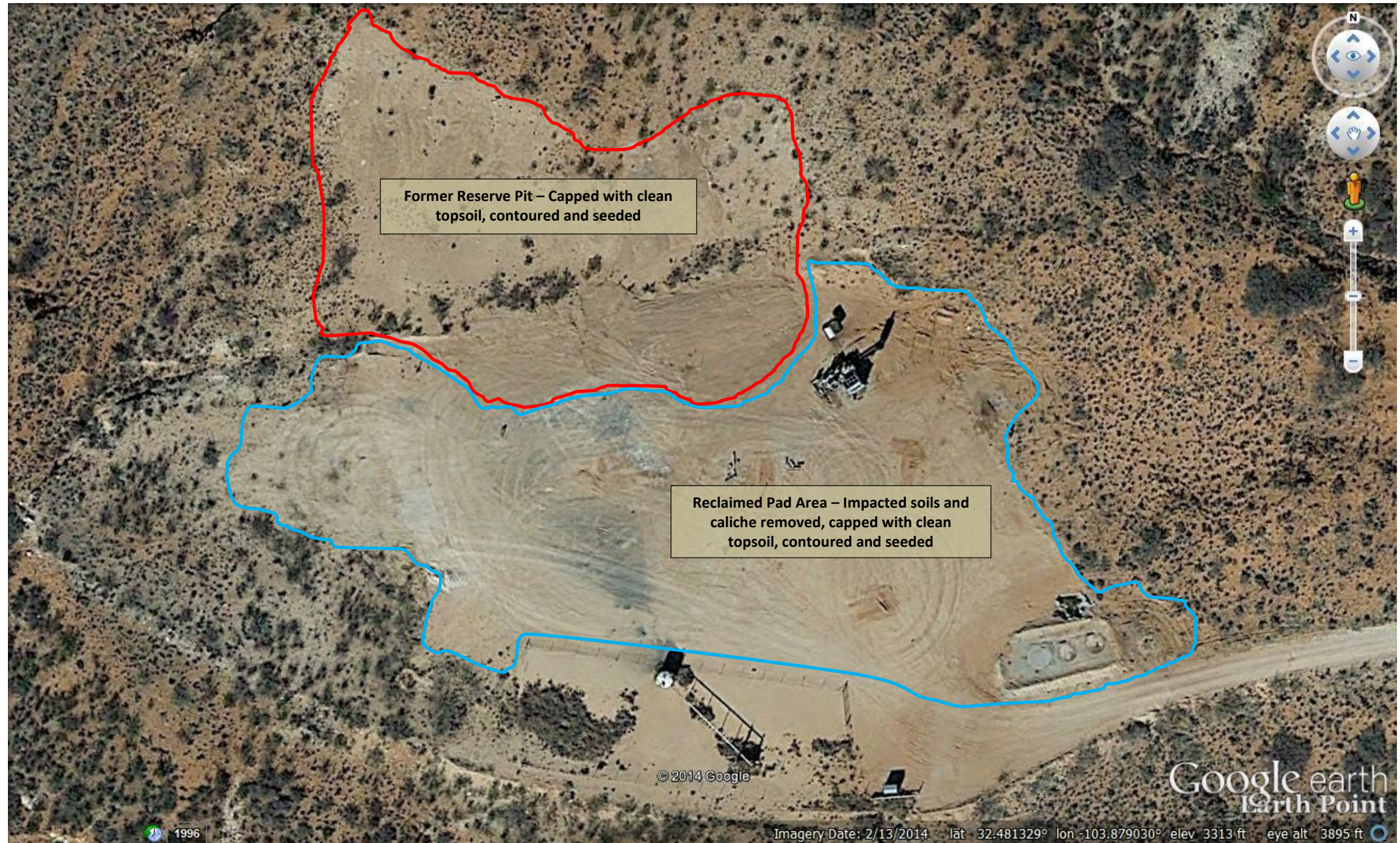


Photo Documentation
Big Eddy Unit #44 Battery #1
Unit Letter H, Section 16, T21S, R30E



Stockpiling clean caliche on east pad, facing east 5/14/2014



Excavating high chloride on west side of pad, facing NNW 5/15/2014



Capping former reserve pit with topsoil, compacting, top photo, facing NW 6/2/2014



West central pad area of high chloride excavation, facing SE 6/4/2014



West pad area of high chloride excavation, facing SW, reserve pit recap – bottom/right 6/4/2014



West pad area of high chloride excavation, facing south 6/4/2014



Compressor site excavation, facing north 6/5/2014



Renewed water diversion north of entire site, facing NW 6/11/2014



Post reclamation area with fencing, facing west from SE corner 6/13/2014



Post reclamation area with fencing, facing NNW from SE corner 6/13/2014

NM OIL CONSERVATION

ARTESIA DISTRICT

AUG 13 2014

Form C-103

Revised November 3, 2011

Submit One Copy To Appropriate District

Office

District I

1625 N. French Dr., Hobbs, NM 88240

District II

811 S. First St., 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

OIL CONSERVATION DIVISION

1220 South St. Francis Dr.

Santa Fe, NM 87505

RECEIVED

WELL API NO.

30-015-21529

5. Indicate Type of Lease

STATE ☒ FEE ☐

6. State Oil & Gas Lease No.

7. Lease Name or Unit Agreement Name

Big Eddy Unit 44 Battery #1

8. Well Number 44

9. OGRID Number

10. Pool name or Wildcat

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 ☐ Gas Well ☐ Other

2. Name of Operator

BOPCO, L.P.

3. Address of Operator

522 W. Mermod, Suite #704, Carlsbad, NM 88220

4. Well Location

Unit Letter H: _____ feet from the _____ line and _____ feet from the _____ line

Section 16 Township 21 Range 30 NMPM _____ County Eddy

11. Elevation (Show whether DR, RKB, RT, GR, etc.)

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

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☐ PLUG AND ABANDON ☐

TEMPORARILY ABANDON ☐ CHANGE PLANS ☐

PULL OR ALTER CASING ☐ MULTIPLE COMPL ☐

OTHER: ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☒ ALTERING CASING ☐

COMMENCE DRILLING OPNS. ☐ P AND A ☐

CASING/CEMENT JOB ☐

☒ Location is ready for OCD inspection after P&A

☒ All pits have been remediated in compliance with OCD rules and the terms of the Operator's pit permit and closure plan.

☒ Rat hole and cellar have been filled and leveled. Cathodic protection holes have been properly abandoned.

☒ A steel marker at least 4" in diameter and at least 4' above ground level has been set in concrete. It shows the

OPERATOR NAME, LEASE NAME, WELL NUMBER, API NUMBER, QUARTER/QUARTER LOCATION OR UNIT LETTER, SECTION, TOWNSHIP, AND RANGE. ALL INFORMATION HAS BEEN WELDED OR PERMANENTLY STAMPED ON THE MARKER'S SURFACE.

☒ The location has been leveled as nearly as possible to original ground contour and has been cleared of all junk, trash, flow lines and other production equipment.

☒ Anchors, dead men, tie downs and risers have been cut off at least two feet below ground level.

☒ If this is a one-well lease or last remaining well on lease, the battery and pit location(s) have been remediated in compliance with OCD rules and the terms of the Operator's pit permit and closure plan. All flow lines, production equipment and junk have been removed from lease and well location.

☒ All metal bolts and other materials have been removed. Portable bases have been removed. (Poured onsite concrete bases do not have to be removed.)

☒ All other environmental concerns have been addressed as per OCD rules.

☒ Pipelines and flow lines have been abandoned in accordance with 19.15.35.10 NMAC. All fluids have been removed from non-retrieved flow lines and pipelines.

☒ If this is a one-well lease or last remaining well on lease: all electrical service poles and lines have been removed from lease and well location, except for utility's distribution infrastructure.

When all work has been completed, return this form to the appropriate District office to schedule an inspection.

SIGNATURE Tony Savoie TITLE EH&S Specialist DATE 7/29/2014

TYPE OR PRINT NAME Tony Savoie E-MAIL: TASavoie@BassPet.com PHONE: 575-887-7329

For State Use Only

APPROVED BY: _____ TITLE _____ DATE _____

Conditions of Approval (if any):