

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

Form C-144
June 1, 2004

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☒

Type of action: Registration of a pit or below-grade tank ☒ Closure of a pit or below-grade tank ☐

Operator: BP America Production Company Telephone: 505-394-1600 e-mail address: _____
Address: PO Box 1089 Eunice, NM 88231
Facility or well name: West Brushy 8 Federal No 002 API #: 30-015-31866 U/L or Qtr/Qtr H Sec 8 T 26S R 29E
County: Eddy Latitude 32° 03' 34.52" Longitude 104° 00' 01.8" NAD: 1927 ☒ 1983 ☐
Surface Owner: Federal ☒ State ☐ Private ☐ Indian ☐

Pit

Type: Drilling ☐ Production ☐ Disposal ☒

Workover ☐ Emergency ☐

Lined ☒ Unlined ☐

Liner type: Synthetic ☒ Thickness 15 mil sides & bottom 20 mil cap

Clay ☒ 1 foot cap of clay in addition to synthetic liner cap

Pit Volume 1615 bbl

Below-grade tank

Volume: _____ bbl Type of fluid: _____

Construction material: _____

Double-walled, with leak detection? Yes ☐ If not, explain why not. _____

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)

Less than 50 feet

(20 points)

50 feet or more, but less than 100 feet

(10 points)

10

100 feet or more

(0 points)

Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)

Yes

(20 points)

No

(0 points)

0

Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)

Less than 200 feet

(20 points)

200 feet or more, but less than 1000 feet

(10 points)

1000 feet or more

(0 points)

0

Ranking Score (Total Points)

10

If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite ☐ offsite ☐ If offsite, name of facility _____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface _____ ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments: This pit will be used for the encapsulation of chloride impacted soil from the West Brushy Federal 8-1, 8-2 and 5-5 well locations. Wells have been plugged and abandoned. All work has been done with the approval of the BLM Carlsbad office and the NMOCD Artesia office.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described 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 ☒.

Date: October 24, 2006

Printed Name/Title Margaret J Lowe/Sr. Environmental Engineer Signature Margaret Lowe

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:

Printed Name/Title Mike Hooker District Signature Mike Hooker Date: 10/25/06

30-015-31866



Margaret J. Lowe

Senior Environmental Engineer
Permian Asset



BP America Production Company
600 N. Marienfeld
Suite 869
PO Box 1610
Midland, TX 79701

October 17, 2006

Mike Bratcher
NM Oil Conservation Division
1301 W Grand Avenue
Artesia, NM 88210

Reference: Brushy Federal Lease
Sections 5 and 8, TS 26S, R
29E

Dear Mr. Bratcher:

I spoke with you in early October regarding BP America Production Company's West Brushy Federal Leases near Loving in Eddy County. We have been working closely with Ms. Terry Gregston of the Carlsbad BLM office to be able to abandon the well sites and battery pad.

Chloride contamination was found and excavated at the following locations.

Well Name	API Number	Cubic Yards of Impacted Soil
West Brushy Federal 8-1	30-015-31675	520
West Brushy Federal 8-2	30-015-31866	840
West Brushy Federal 5-5	30-015-31868	1500

Based on approval from the BLM, BP plans to deep-bury the impacted soil from the 8-1 location which is the location with the highest level of chlorides. Because the 8-1 site has rock at a shallow depth, BP used a pushed-up reserve pit when the well was drilled. For the same reason, we cannot deep-bury chloride impacted soil at the 8-1. We plan to move the impacted soil to the 8-2 location and deep-bury it in a liner along with the impacted soil from the 8-2 and the 5-5. Soil placed in the various excavations as fill will be less than 1000 ppm chlorides. A clay cap will be used to prevent infiltration to the new deep-bury area at 8-2 and the reserve pits areas at 8-2 and 5-5. Additional soil will

be placed on top of the clay to return the surface to previous conditions and the areas will be reseeded in accordance with the BLM stipulations for abandoning the locations.

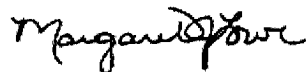
The NMOCD ranking criteria gives a score of 10 points.

Depth to ground water	50 feet or more but less than 100 feet	10
Wellhead protection area	1000 feet or more	0
Distance to surface water	1000 feet or more	0

I would appreciate your prompt response to this request so that we can expedite the remaining closure work to finish the abandonment of the West Brushy Federal leases.

If you need additional information, please contact me by telephone at (432) 556-5322 or by e-mail at lowemj1@bp.com.

Sincerely,



Margaret J. Lowe
Sr. Environmental Engineer

cc: L. May/EUN
File 43B6