District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 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-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

			Res	ponsi	ble Party	7	DENIED
Responsible Party: BP America Production Co			OGRID: 7	78	Closure - Remediation Variance		
Contact Name: Steve Moskal			Contact Telephone: (505) 330-9179				
Contact emai	il: steven.mo	oskal@bpx.com			Incident # (assigned by OCD) NCS1916949750		
Contact mail	ing address:	1199 Main St., St	ite 101, Durango	CO, 8	1301		
Latitude: <u>36.7</u>	228889°				Release So Longitude: Egrees to 5 decim	-108.1172104°	
Site Name: G	ALLEGOS	CANYON UNIT	#505		Site Type: 1	Natural Gas Pro	duction Well Pad
Date Release	Discovered:	March 6, 2019			API#: 30-0	45-28235	- Closure Report does not meet the requirements of 19.15.29.12.E
Unit Letter P Surface Owner	Section 17 r:	Township T29N ⊠ Federal □ Tr	Range R12W	San (Name:		ty	(No Summary of Events) -Varience Request does not meet the requriements of 19.15.29.14.A Must submit a detailed discription of why Operator is requesting Variance, and must clearly state why the variance is protective of fresh water human health and the
Crude Oil		l(s) Released (Select al Volume Release					environment. volumes provided below) vered (bbls)
☐ Produced			d (bbls): Unknov	vn		Volume Recovered (bbls): 0 bbls	
Is the concentration of dissolved chloride in the produced water >10,000 mg/l?		e in the	☐ Yes ☐ No				
Condensa Condensa	te Volume Released (bbls):			Volume Recovered (bbls):			
Natural Gas Volume Released (Mcf)			Volume Recovered (Mcf)				
Other (describe) Volume/Weight Released (provide units)		Volume/Weig	ht Recovered (provide units)				
Cause of Rele	ease:						

Release of condensate and produced water caused from a storage tank integrity failure.

BP has found that the extent of the elevated chlorides appears to not be related to the below grade tank, but may in fact be naturally occurring. The attached document and lab results indicate that the chloride impact footprint far exceeds what is expected and is consistent across approximately 4' from ground surface. The estimated minimum disturbance is approximately 200'x150', or 3,000 square feet, based on current delineation points. Two thirds of this area is covered with native vegetation.

Further, based on the vegetation growth and density, it is apparent that the chloride serves no impact to plan vigor. The excavation and continued delineation would in fact be more detrimental to the area than to leave in place. Currently, the area is covered with native grasses and other plant species that are not exhibiting any type of stress. BP request a variance to close this release.

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Incident ID	
District RP	
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Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release? Greater than 25 bbls
⊠ Yes □ No	
IEVEC i list.	disserved to OCD2 December 2 Termber 2 When and househot many (where a well stars)
	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? ith (cell phone – Voicemail) on October 14, 2019 at 2:00 PM
	Initial Response
The responsible p	party must undertake the following actions immediately unless they could create a safety hazard that would result in injury
The source of the rele	ase has been stopped.
☐ The impacted area has	s been secured to protect human health and the environment.
Released materials ha	ve been contained via the use of berms or dikes, absorbent pads, or other containment devices.
	coverable materials have been removed and managed appropriately.
If all the actions described	l above have not been undertaken, explain why:
has begun, please attach a	AC the responsible party may commence remediation immediately after discovery of a release. If remediation a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred t area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
regulations all operators are public health or the environm failed to adequately investigated to adequately investigated to a second control of the control	mation given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and required to report and/or file certain release notifications and perform corrective actions for releases which may endanger nent. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have atte and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws
Printed Name:	Title:
Signature:	Date:
email:	Telephone:
OCD Only	
Received by:	Date:

Received by OCD: 2/5/2020 11:14:51 AM Form C-141 State of New Mexico Page 3 Oil Conservation Division

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Incident ID	
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Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100</u> (ft bgs)		
Did this release impact groundwater or surface water?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No		
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No		
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No		
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No		
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No		
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No		
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No		
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ⊠ No		
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No		
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No		
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.			
Characterization Report Checklist: Each of the following items must be included in the report.			
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wel Field data Data table of soil contaminant concentration data Depth to water determination 	ls.		

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release

Boring or excavation logs

Topographic/Aerial maps

Photographs including date and GIS information

☐ Laboratory data including chain of custody

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Incident ID		
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Facility ID		
Application ID		İ

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Printed Name:	Title:	
Signature:	Date:	
email:	Telephone:	
OCD Only		
Received by:	Date:	

Received by OCD: 2/5/2020 11:14:51 AM Form C-141 State of New Mexico Page 5 Oil Conservation Division

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District RP	
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Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.			
 Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) 			
Deferral Requests Only: Each of the following item	s must be confirmed as par	rt of any request for	deferral of remediation.
Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.			
Extents of contamination must be fully delineated.			
Contamination does not cause an imminent risk to	human health, the environment	nent, or groundwater	r.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.			
Printed Name:	Title:		
Signature:	Date:		
email:	Telephone:		
OCD Only			
Received by:	Date:		
Approved Approved with Attached C	Conditions of Approval	☐ Denied	☐ Deferral Approved
Signature:	Date:		_

Received by OCD: 2/5/2020 11:14:51 AM
State of New Mexico
Page 6 Oil Conservation Division

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Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.
Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
□ Description of remediation activities
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.
Printed Name: <u>Steve Moskal</u> Title: <u>Environmental Coordinator</u>
Signature:
OCD Only
Received by: Date:
Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.
Closure Approved by: DENIED Date:
Printed Name: Title:
BP has found that the extent of the elevated chlorides appears to not be related to the below grade tank, but may in fact be naturally occurring

BP has found that the extent of the elevated chlorides appears to not be related to the below grade tank, but may in fact be naturally occurring. The attached document and lab results indicate that the chloride impact footprint far exceeds what is expected and is consistent across approximately 4' from ground surface. The estimated minimum disturbance is approximately 200'x150', or 3,000 square feet, based on current delineation points. Two thirds of this area is covered with native vegetation.

Further, based on the vegetation growth and density, it is apparent that the chloride serves no impact to plan vigor. The excavation and continued delineation would in fact be more detrimental to the area than to leave in place. Currently, the area is covered with native grasses and other plant species that are not exhibiting any type of stress. **BP requests a variance for closure of this release.**

SITE MAPS & PHOTOGRAPHS





Received by OCD. Test, Hole B. 14.51 A Page 10 of 75





Test Hole D

Received by (35' West of Excavation) 1 A Page 12 of 75



Test Hole E

Received by (30' NW of Excavation):51 A Page 13 of 75





(P) Sec 17 - T29N - R12W API: 30-045-28235

> 2'-4' Composite CL-: Field Test = 212 ppm, Lab Test = 127 ppm June 19, 2019 Remedial Excavation 11' x 15' x 4.5' Deep Possible Extent of Impacts 2'-4' Composite: CL-: Field Test = 432 ppm, Lab Test = 219 ppm 2'-4' Composite CL-: Field Test = 1,380 ppm 11' Depth CL-: Field Test = 684 ppm, Lab Test = Pending 2'-4' Composite CL-: Field Test = 2,020 ppm, Lab Test = 1,340 ppm 2'-4' Composite CL-: Field Test = 388 ppm, Lab Test = 143 ppm

LABORATORY DATA & REPORTS

	GALLEGOS CANYON UNIT #505											
			La	b Sumn	nary (Va	lues in p	opm)					
Sample ID	Date	Time	GRO	DRO	MRO	TPH	Benzene	Toluene	Ethylbenzene	Xylene	BTEX	Chloride
West Wall 10pt (1-4')	6/21/2019	3:10 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	1810
North Wall 10pt (1-4')	6/21/2019	3:17 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	1370
East Wall 10pt (1-4')	6/21/2019	3:24 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	503
South Wall 10 pt (1-4')	6/21/2019	3:31 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	1020
TH-A (70' NE)	6/24/2019	3:00 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	1210
TH-B (35' East)	6/24/2019	3:04 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	983
TH-C (35' South)	6/24/2019	3:08 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	827
TH-D (35' West)	6/24/2019	3:12 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	875
TH-E (30' NW)	6/24/2019	3:16 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	731
TH-F (100' East)	6/24/2019	4:22 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	113
Release Center @ -11'	6/19/2019	12:00 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	230
12' South of Fence (2'-4')	6/19/2019	2:03 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	1340
12' East of Fence (2'-4')	6/19/2019	2:25 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	219
20' South of Fence (2'-4')	6/19/2019	3:02 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	143
2' North of Fence (2'-4')	6/19/2019	3:13 PM	NS	NS	NS	NS	NS	NS	NS	NS	NS	127
5PC-TB @ 3' & 4' (21)	3/6/2019	10:20 AM	ND	ND	ND	ND	ND	ND	ND	ND	ND	1900
		NMOCD C	losure St	andard	s (ppm)	100	10				50	600



Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 6/25/2019 Job Number: 03143-0424 Work Order: P906111

Project Name/Location: GCU 505

Report Reviewed By:	Walter Homberson	Date:	7/2/19	
-				

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise. Statement of Data Authenticity: Envirotech, Inc, attests the data reported has not been altered in any way. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. Envirotech, Inc, currently holds the appropriate and available Utah TNI certification NM009792018-1 for the data

5796 Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865



BP America Production Co. PO Box 22024 Project Name:

GCU 505

Tulsa OK, 74121-2024

Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
TH-A (70' NE)	P906111-01A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.
TH-B (35' East)	P906111-02A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.
TH-C (35' South)	P906111-03A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.
TH-D (35' West)	P906111-04A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.
TH-E (30' NW)	P906111-05A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.
TH-F (100' East)	P906111-06A	Soil	06/24/19	06/25/19	Glass Jar, 4 oz.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

TH-A (70' NE) P906111-01 (Solid)

Reporting

Analyte Result Limit Units Dilution Batch Prepared Analyzed Method Notes

Anions by 300.0/9056A

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

TH-B (35' East) P906111-02 (Solid)

Reporting

Analyte Result Limit Units Dilution Batch Prepared Analyzed Method Notes

Anions by 300.0/9056A

Chloride 983 20.0 mg/kg 1 1926020 06/26/19 06/26/19 EPA 300.0/9056A

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Ph (505) 632-0615 Fx (505) 632-1865

Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

TH-C (35' South) P906111-03 (Solid)

Reporting

Analyte Result Limit Units Dilution Batch Prepared Analyzed Method Notes

Anions by 300.0/9056A

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal

Reported: 07/02/19 09:43

TH-D (35' West) P906111-04 (Solid)

Reporting

Result Limit Dilution Batch Analyzed Method Analyte Units Prepared Notes

Anions by 300.0/9056A

Chloride 875 20.0 mg/kg 1926020 06/26/19 06/26/19 EPA 300.0/9056A

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

TH-E (30' NW) P906111-05 (Solid)

	,	v	'11	ı.	UJ	T,

		Reporting						
Analyte	Result	Limit Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A								
Chloride	731	20.0 mg/kg	; 1	1926020	06/26/19	06/26/19	EPA 300.0/9056A	

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal

Reported: 07/02/19 09:43

TH-F (100' East) P906111-06 (Solid)

Reporting

Result Limit Units Dilution Batch Analyzed Method Analyte Prepared Notes

Anions by 300.0/9056A

Chloride 113 20.0 mg/kg 1926020 06/26/19 06/26/19 EPA 300.0/9056A

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Project Name:

Reporting

GCU 505

Spike

Source

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal

Reported: 07/02/19 09:43

RPD

%REC

Anions by 300.0/9056A - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1926020 - Anion Extraction EPA 3	00.0/9056A									
Blank (1926020-BLK1)				Prepared &	Analyzed:	06/26/19 1				
Chloride	ND	20.0	mg/kg							
LCS (1926020-BS1)				Prepared &	Analyzed:	06/26/19 1				
Chloride	255	20.0	mg/kg	250		102	90-110			
Matrix Spike (1926020-MS1)	Source	Source: P906110-01		Prepared & Analyzed: 06/26/19 1						
Chloride	258	20.0	mg/kg	250	ND	103	80-120			
Matrix Spike Dup (1926020-MSD1)	Source	: P906110-	01	Prepared &	k Analyzed:	06/26/19 1				
Chloride	264	20.0	mg/kg	250	ND	106	80-120	2.51	20	

QC Summary Report

Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values my differ slightly.

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Ph (505) 632-0615 Fx (505) 632-1865



Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 07/02/19 09:43

Notes and Definitions

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

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5796 US Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865

Three Springs • 65 Mercado Street, Sulte 115, Durango, CO 81301

Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com laboratory envirotech-inc.com

Page 11 of 11

Received by OCD: 2/5/2020 11:14:51 AM



Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 6/21/2019 Job Number: 03143-0424 Work Order: P906104

Project Name/Location: GCU 505

Report Reviewed By:

Wallet Hinkon

Date:

6/25/19

Walter Hinchman, Laboratory Director



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Ph (505) 632-0615 Fx (505) 632-1865



BP America Production Co. PO Box 22024

Tulsa OK, 74121-2024

Project Name: GCU 505 Project Number: 03143-042

Project Manager:

03143-0424 Steve Moskal

Reported: 06/25/19 14:55

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
West Wall 10-pt (1'-4')	P906104-01A	Soil	06/21/19	06/21/19	Glass Jar, 4 oz.
North Wall 10-pt (1'-4')	P906104-02A	Soil	06/21/19	06/21/19	Glass Jar, 4 oz.
East Wall 10-pt (1'-4')	P906104-03A	Soil	06/21/19	06/21/19	Glass Jar, 4 oz.
South Wall 10-pt (1'-4')	P906104-04A	Soil	06/21/19	06/21/19	Glass Jar, 4 oz.

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5796 Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865



Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/25/19 14:55

West Wall 10-pt (1'-4') P906104-01 (Solid)

ъ	
Reporting	

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes

Anions by 300.0/9056A

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5796 Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865

Labadmin@envirotech-inc.com

envirotech-inc.com



Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal Reported:

06/25/19 14:55

North Wall 10-pt (1'-4')

		P9061	.04-02 (50	ona)					
		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	1370	20.0	mg/kg	1	1926001	06/24/19	06/24/19	EPA 300.0/9056A	

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5796 Highway 64, Farmington, NM 87401

Ph (505) 632-0615 Fx (505) 632-1865



Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal

Reported: 06/25/19 14:55

Page 33 of 75

East Wall 10-pt (1'-4') P906104-03 (Solid)

Reporting

Result Limit Units Dilution Batch Analyzed Method Analyte Prepared Notes Anions by 300.0/9056A Chloride 503 20.0 mg/kg 1926001 06/24/19 06/24/19 EPA 300.0/9056A

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal Reported:

06/25/19 14:55

South Wall 10-pt (1'-4') P906104-04 (Solid)

1 900104-04 (Solid)											
	Reporting										
Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes			
1020	20.0	mg/kg	1	1926001	06/24/19	06/24/19	FPA				
1020	20.0	mg/Kg		1920001	00/21/19	00/21/19					
	Result	Reporting Result Limit	Reporting Result Limit Units	Reporting Result Limit Units Dilution	Reporting Result Limit Units Dilution Batch	Reporting Result Limit Units Dilution Batch Prepared	Reporting Result Limit Units Dilution Batch Prepared Analyzed	Reporting Result Limit Units Dilution Batch Prepared Analyzed Method			

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Project Name:

Reporting

GCU 505

Spike

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/25/19 14:55

RPD

%REC

Anions by 300.0/9056A - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1926001 - Anion Extraction EPA 300.	0/9056A									
Blank (1926001-BLK1)				Prepared: (06/24/19 0	Analyzed: 0				
Chloride	ND	20.0	mg/kg							
LCS (1926001-BS1)				Prepared: 06/24/19 0 Analyzed: 06/24/19 1						
Chloride	251	20.0	mg/kg	250		100	90-110			
Matrix Spike (1926001-MS1)	Source	e: P906104-	01	Prepared: 06/24/19 0 Analyzed: 06/24/19 1						
Chloride	1220	20.0	mg/kg	250	1810	NR	80-120			SPK1
Matrix Spike Dup (1926001-MSD1)	Source	Source: P906104-01			Prepared: 06/24/19 0 Analyzed: 06/24/19 1					
Chloride	1270	20.0	mg/kg	250	1810	NR	80-120	4.43	20	SPK1

QC Summary Report

Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values my differ slightly.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/25/19 14:55

Notes and Definitions

SPK1 The spike recovery is outside of quality control limits.

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

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Page 9 of 9

Page 37 of 75

eceived by OCD: 2/5/2020 11:14:51 AM



Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 6/19/2019 Job Number: 03143-0424 Work Order: P906088

Project Name/Location: GCU 505

Report Reviewed By:	Wallet Hinkman	D	oate:	6/26/19	

Walter Hinchman, Laboratory Director



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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/26/19 09:48

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Release Center @ -11'	P906088-01A	Soil	06/19/19	06/19/19	Glass Jar, 4 oz.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/26/19 09:48

300.0/9056A

Release Center @ -11' P906088-01 (Solid)

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									<u> </u>
Chloride	230	20.0	mg/kg	1	1925040	06/21/19	06/21/19	EPA	

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Matrix Spike Dup (1925040-MSD1)

Chloride

Project Name:

Source: P906094-01

263

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424
Project Manager: Steve Moskal

Reported: 06/26/19 09:48

0.0608

20

Anions by 300.0/9056A - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
		2		Ec. (c)	Trobuit	, , , ,	2		2,,,,,	11000
Batch 1925040 - Anion Extraction EPA 300.0	9056A									
Blank (1925040-BLK1)				Prepared: 0	06/21/19 0 A	Analyzed: 0	6/21/19 1			
Chloride	ND	20.0	mg/kg							
LCS (1925040-BS1)				Prepared: 0	06/21/19 0 A	Analyzed: 0	6/21/19 1			
Chloride	252	20.0	mg/kg	250		101	90-110			
Matrix Spike (1925040-MS1)	Sour	ce: P906094-0)1	Prepared: 0	06/21/19 0 A	Analyzed: 0				
Chloride	263	20.0	mg/kg	250	ND	105	80-120			

mg/kg

Prepared: 06/21/19 0 Analyzed: 06/21/19 1

QC Summary Report

Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values my differ slightly.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/26/19 09:48

Notes and Definitions

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

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Project Information Chain of Custod Client: Report Attention									stody Lab Use Only TAT							- 1	Page of EPA Program				
_			-07-				Report Attention		Lab Use Only Lab WO# Job Number					201							
<u>Project:</u>	<u>(</u> -C	JU 5	05	1 /		Report due	by: 6/27/2019 Stive Mostal	-B C D/	Lab	WO	‡ A 00						1D	30	RCRA	CWA	SDWA
	Manager	: Stev	ie pro	25/54/			Stive Mostil	ett Buch	P	1061	000				042		\sqcup	$\perp \perp$			
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City, Sta	ite, Zip				14.00	City, State,	<u> </u>		8015	015										NM CO	UT AZ
Phone:					TECHNISE.	Phone:			1 &	by 8	17	09	2	00.0						$ \chi $	
Email:			T	T	6010	Email:			유	SRO.	8 (y 82	9 60	Je 3	18.1						
Time Sampled	Date Sampled	Matrix	No Containers	Sample ID				Lab Number	DRO/ORO	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	TPH 418.1					Ren	narks
1700	6/19/19	SOIL	1	Release	ce Ce	nter 0	-11'							X							
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Addition	nai Instru	ictions:	BILL I	spx to be	Prep	ared										٧	-5	ia	,12	cooles	
			d authenticit		am aware	hat tampering wi	th or intentionally mislabelling th	e sample location	n, date	or			100		-					ce the day they a °C on subsequent	2-7-3-6-9-4-5- 8 -9-0-11-7-5-
Relinquish	ed by: (Sign	nature)	Date 6/19		162L	Received	by: (Signature)	Date 6/19/	19	Time	;21	4	Rece	eived	d on i	ce:	N. Photos	b Use	Only		
Refunquish	ed by: (Sig	nature)	Date				by: (Signature)	Date		Time			T1		np °C		<u>T2</u>			<u>T3</u>	
Sample Ma	trix: S - Soil,	Sd - Solid, S	g - Sludge,	A - Aqueous, O -	Other			Containe	r Typ	e: g -	glass	, p -				_	nber	glass,	v - VOA		
Note: Samp	les are disca	rded 30 day	ys after resu	ılts are reported	unless of		nts are made. Hazardous sa The liability of the laboraotry	mples will be re	eturne	d to cli	ent or	dispo	sed of	at the							he above
	en	vi	rot	ech			5796 US Highway 64, Farmington, NA	187401	-		-	Ph (50	5) 632-0	515 Fx	(505) 632	2-1865					aviotech inc com
				aborator			Three Springs - 65 Mercado Street, Su	ite 115, Durango, (O l	81301			Ph (97	0) 259-0	515 Fr	(800) 362	-1879				laboratory le	nykotech inc com

laboratory//envirolech-inc cor Page 6 of 6



Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 6/19/2019 Job Number: 03143-0424 Work Order: P906087

Project Name/Location: GCU 505

Report	Reviewed	By:
--------	----------	-----

Wallet Hinkon

Date:

6/21/19

Walter Hinchman, Laboratory Director



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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
12' South of Fence (2'-4')	P906087-01A	Soil	06/19/19	06/19/19	Glass Jar, 4 oz.
12' East of Fence (2'-4')	P906087-02A	Soil	06/19/19	06/19/19	Glass Jar, 4 oz.
20' South of Fence (2'-4')	P906087-03A	Soil	06/19/19	06/19/19	Glass Jar, 4 oz.
2' North of Fence (2'-4')	P906087-04A	Soil	06/19/19	06/19/19	Glass Jar, 4 oz.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

12' South of Fence (2'-4')

P906087-01 (Solid)

Reporting Result Limit Units Dilution Batch Analyzed Method Analyte Prepared Notes Anions by 300.0/9056A Chloride 1340 20.0 mg/kg 1925028 06/19/19 06/20/19 EPA 300.0/9056A

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

12' East of Fence (2'-4') P906087-02 (Solid)

		P9060	87-02 (Sc	olid)					
		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	219	20.0	mg/kg	1	1925028	06/19/19	06/20/19	EPA	
Cinoriae	21)	20.0		•	1,20020	00/15/15	00/20/19	300.0/9056A	

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

20' South of Fence (2'-4') P906087-03 (Solid)

		Reporting	`	,					
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	143	20.0	mg/kg	1	1925028	06/19/19	06/20/19	EPA 300.0/9056A	_

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal

Reported: 06/21/19 11:35

300.0/9056A

2' North of Fence (2'-4') P906087-04 (Solid)

				,					
		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	127	20.0	mg/kg	1	1925028	06/19/19	06/20/19	EPA	

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Project Name:

Reporting

GCU 505

Spike

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

RPD

%REC

Anions by 300.0/9056A - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1925028 - Anion Extraction EPA 300	0.0/9056A									
Blank (1925028-BLK1)				Prepared: (06/19/19 1 2	Analyzed: 0	6/20/19 0			
Chloride	ND	20.0	mg/kg							
LCS (1925028-BS1)				Prepared: (06/19/19 1 2	Analyzed: 0	6/20/19 0			
Chloride	268	20.0	mg/kg	250		107	90-110			
Matrix Spike (1925028-MS1)	Source	e: P906086-	01	Prepared: (06/19/19 1 2	Analyzed: 0	6/20/19 1			
Chloride	265	20.0	mg/kg	250	ND	106	80-120			
Matrix Spike Dup (1925028-MSD1)	Source	e: P906086-	01	Prepared: (06/19/19 1 2	Analyzed: 0	6/20/19 1			
Chloride	267	20.0	mg/kg	250	ND	107	80-120	0.644	20	

QC Summary Report

Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values my differ slightly.

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Project Name:

GCU 505

PO Box 22024 Tulsa OK, 74121-2024 Project Number: 03143-0424 Project Manager: Steve Moskal **Reported:** 06/21/19 11:35

Notes and Definitions

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

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Project Information Chain of Custody											ustody Page of								of I		
Client:	BPX					Report Atten	ition		NEED!	diam'r.	La	b Us	e On	ly			TA			A Progra	
Project:						Report due by: 6/20/2 Attention: Teff Blagg	2019		Lab '	WQ#			Job I				1D	3D	RCRA	CWA	SDWA
Project I	Manager	: 5te	ve Ma	25/=a/	_	Attention: Jeff Blagg	Steve V	Mostal	PY	WO#	28		0314	13-1	742 1		X				
<u>Address</u>	•					Address:						Α	nalys	sis ar	d Me	etho	d			Sta	ate
City, Sta	te, Zip					City, State, Zip			8015	8015										NM CO	UT AZ
Phone:					- 4	Phone:			86	% &C	77			0.0						V	
Email:						Email:			80	8	/ 80	826	901	e 30	418.1						
Time Sampled	Date Sampled	Matrix	No Containers	Sample ID				Lab Number	DRO/ORO by	GRO/DRO by 8	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	TPH 41					Rem	narks
1403	6/19/2019	Soil	١	12' 5	South	n of Fance (2-4	-)							X							
1425			1	12' E	AST	OF Fence (2-4		لع						X							
1502			l	Zo´s	South	of Fence (2-4) OF Fence (2-4) of Fence (2-4) of Fence (2-4)	4-)	3						X							
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					:-::::::::::::::::::::::::::::::::::::																
		-					Wes see													(4)	
							Į.	ASSESSED OF STREET													
Addition	al Instru	ctions:	BILL	BPX		P.O. to be	Prepor	ed							\)	íS	,'c(2/	n <i>co</i>	olec	
				of this sample.		e that tampering with or intentionally misla led by:				r	_				g therm	al prese	ervation	must be	received on ic	e the day they a Con subsequent	re sampled or
Relinguish	ed by: (Sign	nature) e96	Date 6/10	7/19	me 163	Received by: (\$ignsty)		Date 9 /	(9	Time 16-	3	7	Rece	eived	l on i	ce:		Use V/I	Only		
Relinquish	ed by: (Sigr	náture)	Date		me	Received by: (Signature		Date		Time			T1 AVG			Ч	T2			<u>T3</u>	
Sample Mat	rix: S - Soil, :	Sd - Solid, S	g - Sludge, A	\ - Aqueous, O	- Other _			Container	Туре	e: g - f	glass	-				- an	nber	glass,	v - VOA		Action to the second
						other arrangements are made. Hazard with this COC. The liability of the lab	dous sample	s will be re	urned	to clie	nt or	dispos	ed of	at the						analysis of t	he above
1	en	wi.	to	90		W. Stratical W. Albert				C2-11/6-	estrible:										



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Ph (970) 259-0615 Fr (800) 362-1879

BELOW GRADE TANK CLOSURE INFO 3/6/2019

CLIENT: BPX		SINEERING, IN		API#: 300452	28235
CLIENT: DI A	P.O. BOX 87, BLC (505)	632-1199	187413	TANK ID (if applicble):	Α
FIELD REPORT:	(circle one): BGT CONFIRMATION / RE		THER:	,	of 1
SITE INFORMATION	I: SITE NAME: GCU # 50)5		DATE STARTED: 03	3/06/19
		NM CNTY: SJ	st: NM		100/10
				DATE FINISHED:	
1/4 - 1/4/FOOTAGE: 1,204'S / 1,1		FEDERAL STATE / CROSSFIR	RE	ENVIRONMENTAL SPECIALIST(S):	NJV
		RACTOR: BPX - D. B			
REFERENCE POINT					
1) 21 BGT (SW/DB)	GPS COORD.: 36.722	2916 X 108.116599	DISTANCE/BEA	RING FROM W.H.: 181', I	N87.5E
2)	GPS COORD.:		DISTANCE/BEA	RING FROM W.H.:	
3)	GPS COORD.:		DISTANCE/BEA	RING FROM W.H.:	
4)	GPS COORD.:		DISTANCE/BEA	RING FROM W.H.:	
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LA	AB USED: HALL			OVM READING (ppm)
1) SAMPLE ID: 5PC - TB @ 3'-4	(21) SAMPLE DATE: 03/06/19	SAMPLE TIME:1020	LAB ANALYSIS: 801	15B/8021B/300.0 (CI)	NA NA
2) SAMPLE ID:					
SAMPLE ID: SAMPLE ID:					
	SAMPLE DATE:				
SOIL DESCRIPTION					
SOIL COLOR: DARK YEL					ICLUV DI ACTIC
COHESION (ALL OTHERS): NON COHESIVE SLIGHTL		ASTICITY (CLAYS): NON PLASTIC ENSITY (COHESIVE CLAYS & S			GHLY PLASTIC
CONSISTENCY (NON COHESIVE SOILS): LC	DOSE FIRM DENSE / VERY DENSE HC	ODOR DETECTED: YES NO	,		
MOISTURE: DRY SLIGHTLY MOIST / W	I —				
SAMPLE TYPE: GRAB COMPOSITE - 3 DISCOLORATION/STAINING OBSERVED: YES		Y AREAS DISPLAYING WETNES	S: YES NO EXPLAN	NATION -	
SITE OBSERVATION	<u> </u>	S (NO EVDI ANATION			
APPARENT EVIDENCE OF A RELEASE OBSERVE					
EQUIPMENT SET OVER RECLAIMED AREA:	YES NO EXPLANATION - 45 BBL AB	OVE-GRADE TANK (AGT)	SET ATOP BGT LO	OCATION.	
OTHER: NMOCD OR BLM REPS. NOT PROMENT. 21 BBL BGT BOTTOM WAS A				PRIOR TO TEST HOLE A	DVANCE -
EXCAVATION DIMENSION ESTIMATION		. X ft.		ΓΙΜΑΤΙΟΝ (Cubic Yards) :	
DEPTH TO GROUNDWATER: > 100'	NEAREST WATER SOURCE: > 1,000'	NEAREST SURFACE WATER: _	> 1,000'	NMOCD TPH CLOSURE STD:	2,500 ppm
SITE SKETCH	BGT Located: off on site	PLOT PLAN circl	le: attached OVM	CALIB. READ. = NA	_ppm RF =1 00
			A 1	CALIB. GAS = NA	_ppm RF =1.00
			I I	:: 	NA NA
	BERM \		141	MISCELL. NO	JTE6
	FIBE	RGLASS			
ı	ENCE	USING	_	O#: 4301062122 EF#:	
			_	Er #. ID:	
		PBGTL			
—	(x x x)	T.B. ~ 3' B.G.	-		/13/19
TO W.H.					/22/19
			Tai	nk OVM = Organic Vapor	Meter
				BGT Sidewalls Visible: Y	
		Y	: - S.P.D.	BGT Sidewalls Visible: Y	/ N
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATI	ON DEPRESSION; B.G. = BELOW GRADE; B = BELOV		V.H. = WELL HEAD;	BGT Sidewalls Visible: Y	
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BE	LOW-GRADE TANK LOCATION; SPD = SAMPLE POINT <u>E WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM</u>	DESIGNATION; R.W. = RETAINING	WALL; NA - NOT N	lagnetic declination:	10°E
NOTES: GOOGLE EARTH IMAG	ERY DATE: 3/15/2015.	ONSITE: 03/06/1	<u> </u>		

revised: 11/26/13 BEI1005E-6.SKF

Analytical Report

Lab Order **1903282**Date Reported: **3/8/2019**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB @ 3' & 4' (21)

Project: GCU 505

Collection Date: 3/6/2019 10:20:00 AM

Lab ID: 1903282-001 **Matrix:** SOIL **Received Date:** 3/7/2019 7:00:00 AM

Analyses	Result	RL	Qual Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS					Analyst	: MRA
Chloride	1900	60	mg/Kg	20	3/7/2019 12:17:24 PM	43555
EPA METHOD 8015M/D: DIESEL RANGE ORG	SANICS				Analyst	: Irm
Diesel Range Organics (DRO)	ND	9.7	mg/Kg	1	3/7/2019 11:04:23 AM	43552
Motor Oil Range Organics (MRO)	ND	48	mg/Kg	1	3/7/2019 11:04:23 AM	43552
Surr: DNOP	93.5	70-130	%Rec	1	3/7/2019 11:04:23 AM	43552
EPA METHOD 8015D: GASOLINE RANGE					Analyst	: RAA
Gasoline Range Organics (GRO)	ND	3.8	mg/Kg	1	3/7/2019 9:28:57 AM	43530
Surr: BFB	93.4	73.8-119	%Rec	1	3/7/2019 9:28:57 AM	43530
EPA METHOD 8021B: VOLATILES					Analyst	: RAA
Benzene	ND	0.019	mg/Kg	1	3/7/2019 9:28:57 AM	43530
Toluene	ND	0.038	mg/Kg	1	3/7/2019 9:28:57 AM	43530
Ethylbenzene	ND	0.038	mg/Kg	1	3/7/2019 9:28:57 AM	43530
Xylenes, Total	ND	0.077	mg/Kg	1	3/7/2019 9:28:57 AM	43530
Surr: 4-Bromofluorobenzene	99.3	80-120	%Rec	1	3/7/2019 9:28:57 AM	43530

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits Page 1 of 5
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Page 56 of 75

C	hain-c	of-Cus	stody Record	Turn-Around 1	Time:	SAME	HALL ENVIRONMENTAL															
Client:	BLAG	G ENGR.	/ BP AMERICA	Standard Project Name:	✓ Rush _	DAY)				A	N	AL.	YS	IS	S L	A.		R/	ATC			
Mailing A	ddress:	P.O. BO	X 87	-	GCU #50)5		490	01 H	awkii									9			
		BLOOM	FIELD, NM 87413	Project #:				Те	l. 50	5-34	5-39	75 Fax 505-345-4107										
Phone #:		(505) 63	32-1199									Aı	naly	sis	Rec	ques	t					
email or l	ах#:			Project Manag	jer:									4				ਜ਼				
QA/QC Pa Stand	-		Level 4 (Full Validation)		STEVE MO	SKAL	(8021B)	s only)	/ MRO)			AS)		PO ₄ ,SC	2 PCB's			water - 300.1)			e e	
Accreditat	tion:			Sampler:	NELSON VI		8) 16	(Ga	/ DRO	(T)	<u></u>	8270SIMS)		NO ₂	808			~			amb	
□ NELAF		□ Other		On Ice:	⊠(Yes	□ No ?? <i>\</i>	1	표	70	418	504	827	S	<u>°</u>	es/	:	(A)	300.0			tes	Z
□ EDD (Type) Time	Matrix	Sample Request ID	Sample Tempor Container Type and # Must Ka	erature:	o` HEAL No. 1903282_	BTEX ← NATBE →	BTEX + MTBE + TPH (Gas	TPH 8015B (GRO	TPH (Method 418.1)		PAH (8310 or	RCRA 8 Metals	Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil -		Grab sample	5 pt. composite sample	Air Bubbles (Y or N)
3/6/19	1020	SOIL	5PC-TB@3'より*(21)	4 oz 1	Cool	701	٧		٧									V		T	٧	
																			T	\top		
																				十	十	
																			寸	十	\top	\neg
																			\exists			\neg
																			\top	7		\neg
												1				-		\neg	\dashv	十	\top	٦
													7						\neg	十	\top	
											\dashv								1	十	\top	
											1	1									寸	
		 										1								\top	十	\neg
		<u></u>									\top	1								十	\dashv	\dashv
Date: 3/6/17 Date:	Time:	Relinquish	ed by:	Received by:	D 03	Date Time Date Time Date Time Date Time			ACT:	BILL DI VIB: STEVI	E MC	DSKA	L,/ [ACT V		SEA	PONE	गायख	nV
3/6/19	If necessar	ary, samples	submitted to Hall Environmental may be	subcontracted to other	accredited laboratorie	es. This serves as notice of	this p	ossibili	ity. Ar	ny sub-c	ontra	cted d	ata w	ill be	clearly	/ notat	ed on	the an	alytical	героп	t.	

Hall Environmental Analysis Laboratory, Inc.

WO#: 1903282

08-Mar-19

Client:

Blagg Engineering

Project:

GCU 505

Sample ID: MB-43555

SampType: mblk

TestCode: EPA Method 300.0: Anions

Client ID: PBS

Batch ID: 43555

PQL

RunNo: 58187

SeqNo: 1952520

Units: mg/Kg

Prep Date: 3/7/2019

Analysis Date: 3/7/2019

SPK value SPK Ref Val %REC

LowLimit HighLimit

%RPD **RPDLimit**

Qual

Analyte Chloride

ND 1.5

Sample ID: LCS-43555

SampType: Ics

RunNo: 58187

Client ID: LCSS Prep Date:

Batch ID: 43555 Analysis Date: 3/7/2019

SeqNo: 1952521

Units: mg/Kg

Analyte

14

RPDLimit

1.5

15.00

95.0

Qual

SPK value SPK Ref Val %REC LowLimit

TestCode: EPA Method 300.0: Anions

3/7/2019

Result

Result

0

Chloride

HighLimit

%RPD

110

- Qualifiers:
- ND Not Detected at the Reporting Limit

Practical Quanitative Limit

D Sample Diluted Due to Matrix Η Holding times for preparation or analysis exceeded

Value exceeds Maximum Contaminant Level.

% Recovery outside of range due to dilution or matrix

В

- Е Value above quantitation range J Analyte detected below quantitation limits
- P Sample pH Not In Range RL Reporting Detection Limit
- Sample container temperature is out of limit as specified

Analyte detected in the associated Method Blank

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

Result

ND

ND

9.2

PQL

10

50

10.00

WO#: **1903282**

08-Mar-19

Client:

Analyte

Surr: DNOP

Diesel Range Organics (DRO)

Motor Oil Range Organics (MRO)

Blagg Engineering

Project:

GCU 505

Sample ID: LCS-43552	SampT	ype: LC	s	TestCode: EPA Method 8015M/D: Diesel Range Organics									
Client ID: LCSS	•	Batch ID: 43552 RunNo: §					o: 58182						
Prep Date: 3/7/2019	Analysis D	ate: 3/	7/2019	9	SeqNo: 1	951337	Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Diesel Range Organics (DRO)	41	10	50.00	0	82.8	63.9	124						
Surr: DNOP	4.3		5.000		86.0	70	130						
Sample ID: MB-43552	SampT	уре: МЕ	BLK	Tes	tCode: El	PA Method	8015M/D: Die	esel Rang	e Organics				
Client ID: PBS	Batch	1D: 43	552	F	RunNo: 5	8182							
Prep Date: 3/7/2019	Analysis D	ate: 3/	7/2019	5	SegNo: 1	951338	Units: mg/K	(q					

SPK value SPK Ref Val %REC LowLimit

92.2

HighLimit

130

70

%RPD

RPDLimit

Qual

A	ifiers
CHIA	HIPTS

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: **1903282**

08-Mar-19

Client:

Blagg Engineering

Project:

GCU 505

Sample ID: LCS-43530	SampT	ype: LC	S	Test	e						
Client ID: LCSS	Batch	ID: 43	530	R	tunNo: 58	8169					
Prep Date: 3/6/2019	Analysis Date: 3/7/2019			S	eqNo: 19	950867	Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Gasoline Range Organics (GRO)	26	5.0	25.00	0	105	80.1	123				
Surr: BFB	1100		1000		107	73.8	119				

Sample ID: MB-43530	SampT	Гуре: МЕ	BLK	Tes	tCode: El	EPA Method 8015D: Gasoline Range									
Client ID: PBS	Batch	h ID: 43	530	F	RunNo: 5	8169									
Prep Date: 3/6/2019	Analysis D	Date: 3/	7/2019	8	SeqNo: 1	950899	Units: mg/K	(g							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual					
Gasoline Range Organics (GRO)	ND	5.0													
Surr: BFB	960		1000		95.6	73.8	119								

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Page 4 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#: **1903282**

08-Mar-19

Client:

Blagg Engineering

Project: GCU 505

Sample ID: LCS-43530 SampType: LCS				TestCode: EPA Method 8021B: Volatiles							
Client ID: LCSS	D: LCSS Batch ID: 43530			F	RunNo: 5						
Prep Date: 3/6/2019	ate: 3/6/2019 Analysis Date: 3/7/2019				SeqNo: 1950868 Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	0.94	0.025	1.000	0	94.0	80	120				
Toluene	0.98	0.050	1.000	0	98.3	80	120				
Ethylbenzene	0.99	0.050	1.000	0	98.9	80	120				
Xylenes, Total	3.0	0.10	3.000	0	101	80	120				
Surr: 4-Bromofluorobenzene	1.0		1.000		99.6	80	120				

Sample ID: MB-43530	BLK	TestCode: EPA Method 8021B: Volatiles										
Client ID: PBS	ent ID: PBS Batch ID: 43530					RunNo: 58169						
Prep Date: 3/6/2019	3/6/2019 Analysis Date: 3/7/2019			SeqNo: 1950900 Units: mg/Kg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	ND	0.025										
Toluene	ND	0.050										
Ethylbenzene	ND	0.050										
Xylenes, Total	ND	0.10										
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120					

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Page 5 of 5



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name:	BLAGG		Work	Order Num	ber: 190	3282			RoptNo:	1
				OD	武 3	7.19				
Received By:	Anne Tho	rne	3/7/201	9 7:16:00 A	м		an	A-	_	
Completed By:	Anne Tho	rne		9 7:23:49 A	м		an	1	_	
Reviewed By:	to		3/2/19				200.000			
1.11	. 0 h	: Ar	03/07/	19						
Chain of Cus		(- 1	03/01/	()						
1. Is Chain of C		lete?			Yes	v	No		Not Present	
2. How was the							1.72			
Z. How was the	sample uem	ereur			Cou	ner				
Log In										
3. Was an atten	mpt made to	cool the samp	les?		Yes	~	No		NA 🗆	
4. Were all same	ples received	at a tempera	ature of >0° C	to 6.0°C	Yes	~	No		NA 🗆	
-										
5. Sample(s) in	proper conta	iner(s)?			Yes	~	No			
6. Sufficient sam	nnie volume f	or indicated t	oet/e)?		Yes	V	No	П		
561				- 42	Yes		No			
7. Are samples (The second second	openy preserve	BOY		_		Lei		
Was preserva	ative added to	bottles?			Yes		No	V	NA 🗆	
9. VOA vials hav	ve zero heads	space?			Yes		No		No VOA Vials 🗹	N 03/01/1
10. Were any sar	mple containe	ers received t	roken?		Yes		No	~		13/01
									# of preserved bottles checked	WO.
11. Does paperwo	ork match bo	ttle labels?			Yes	~	No		for pH:	3>
(Note discrepa	ancies on cha	ain of custody)							>12 unless noted)
2. Are matrices	correctly iden	tified on Cha	in of Custody?		Yes	V	No		Adjusted?	
3. Is it clear wha	it analyses w	ere requested	17		Yes		No			
14. Were all holdi					Yes	~	No		Checked by:	
(If no, notify c	ustomer for a	uthorization.)						1		
Special Handl	ling (if app	olicable)								
15. Was client no			with this order?	,	Yes		No		NA 🗹	
1 200				e	1,000,000		5150			
0.0000000000000000000000000000000000000	Notified:			Date	Ţ					
By Who				Via:	_ eM	ail _	Phone _	Fax	_ In Person	
Regard										
Client In	nstructions:									
16. Additional re	marks:									
17. Cooler Infor	rmation									
Cooler No		Condition	Seal Intact	Seal No	Seal D	ate	Signed B	Зу		
1	1.0	Good	Yes							





SITE RANKING CRITERIA

SITING AND HYDRO-GEOLOGICAL REPORT FOR GALLEGOS CANYON UNIT 505

Siting Criteria 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be greater than 100 feet (ft.) below grade (b.g.). This estimation is based on data from Stone and others (1983) and depth to groundwater data obtained from water wells permitted by the New Mexico State Engineer's Office (NMOSE). Local topography and proximity to adjacent water features were also considered. Figure 1, utilized from the adjacent well site's (GCU 134E) 95 barrel bgt permit, and an aerial map provided as Figure 1A, demonstrates that there are no freshwater wells or springs within 200 ft. of the below-grade tank (BGT). A topographic map (Figure 2) demonstrates that the BGT is not within 100 ft. of any continuously flowing watercourse or any other significant watercourse, lakebed, sinkhole or playa lake as measured from the ordinary high water mark. Figure 3, also utilized from the GCU 134E bgt permit, demonstrates that the BGT is not within 500 ft. of a wetland. Figure 4, once again utilized from the GCU 134E bgt permit, demonstrates that the BGT is not within the mapped FEMA 100-year floodplain. The BGT locations from both the GCU 134E and GCU 505 are within 320 ft. of each other.

Local Geology and Hydrology

This particular site is located on a mesa top, north of the San Juan River within the Nacimiento Formation between the Animas and San Juan Rivers. The nearest water well found is POD SJ01566 (attached) and located in NW/4 SW/4, Section 8, T29.0N, R12W, 1.3 miles, north of the GCU 505 well site (ground elevation – 5,693 ft.). POD SJ01566 had recorded depth to water at 60 ft. b.g. and its current ground elevation is approximately 5,635 ft.; resulting in depth to water elevation of 5,575 ft. The San Juan River is south of the site, approximately 1.5 miles away and 300 ft. lower in elevation.

Regional Geology and Hydrology

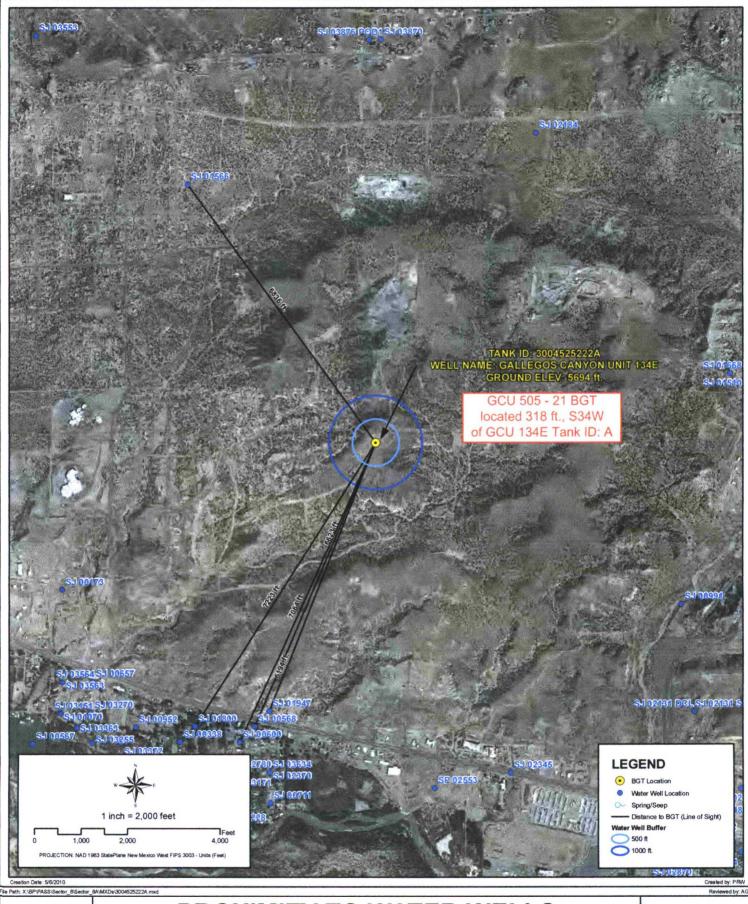
The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). In most of the proposed area, the Nacimiento Formation lies at the surface and grades into the Animas Formation to the west. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2,232 ft. (Stone et al., 1983). Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1,000 ft. deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft²/d (Stone et al,1983). Groundwater within these aquifers flows toward the San Juan River.

References

Circular 154—Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

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

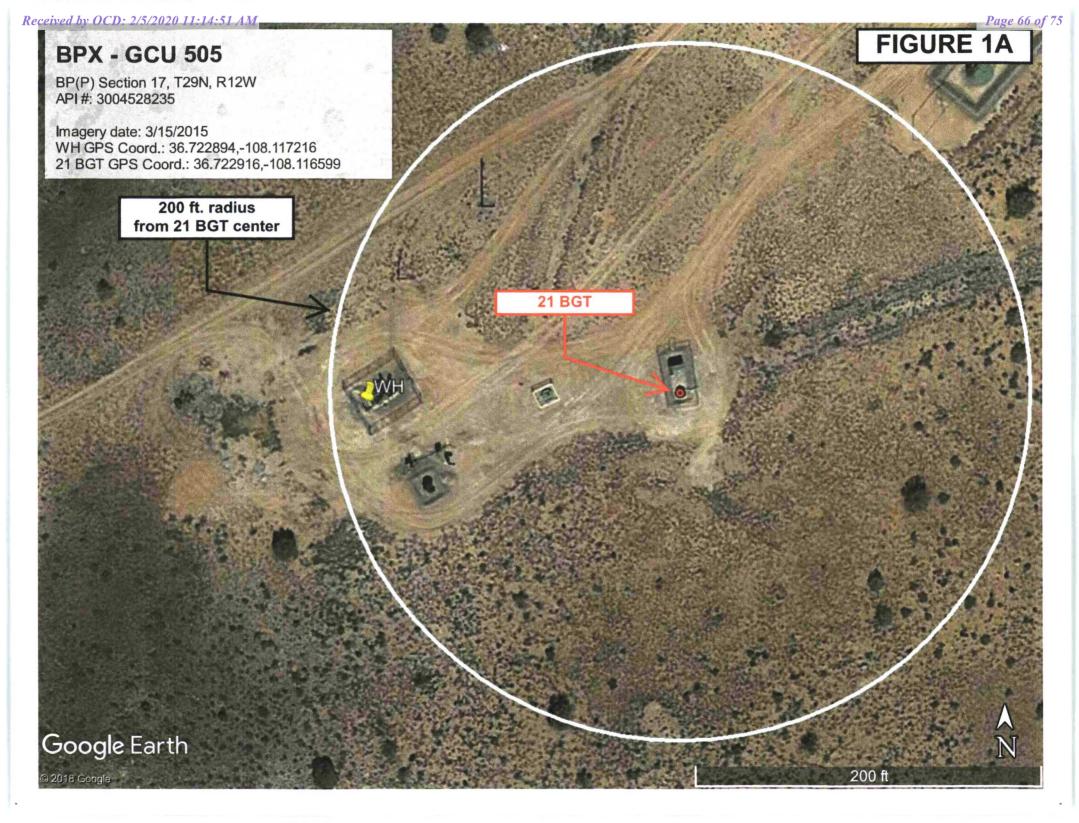


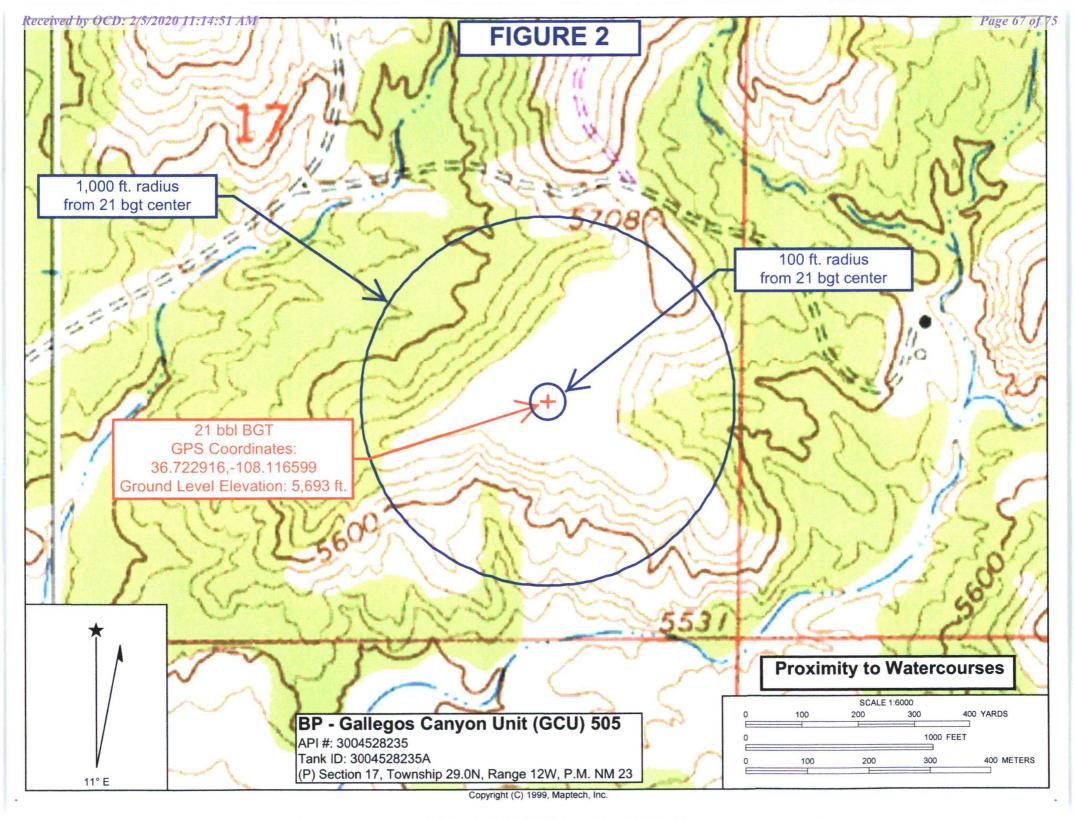
bp

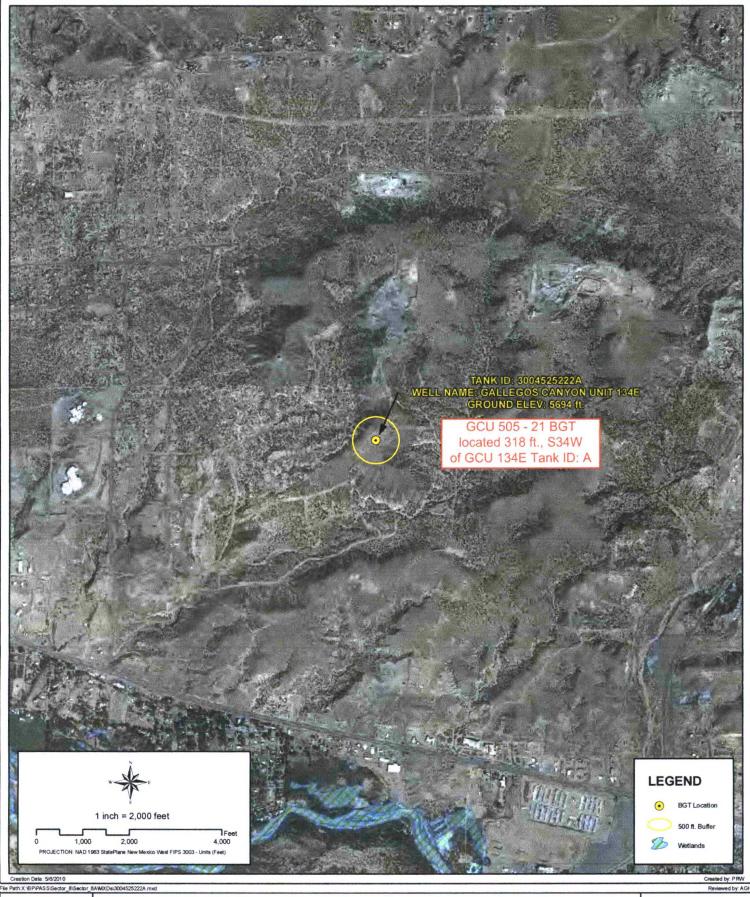
PROXIMITY TO WATER WELLS

WELL NAME: GALLEGOS CANYON UNIT 134E
API NUMBER: 3004525222 TANK ID: 3004525222A
SECTION 17, TOWNSHIP 29.0N, RANGE 12W, P.M. NM23

FIGURE **1**



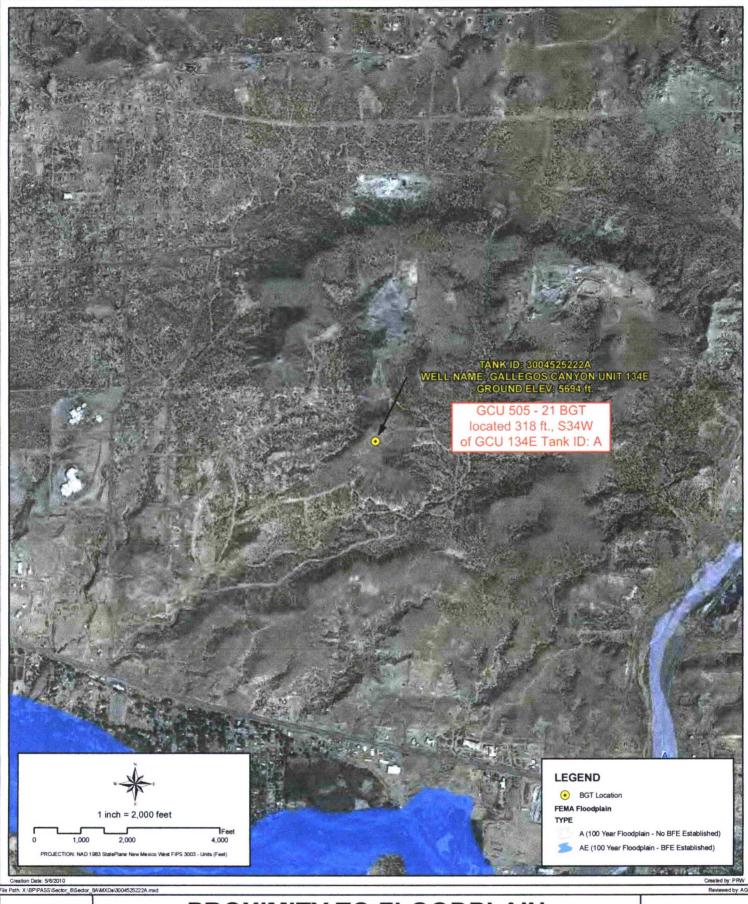






PROXIMITY TO WETLANDS

WELL NAME: GALLEGOS CANYON UNIT 134E API NUMBER: 3004525222 TANK ID: 3004525222A SECTION 17, TOWNSHIP 29.0N, RANGE 12W, P.M. NM23 **FIGURE**





PROXIMITY TO FLOODPLAIN

WELL NAME: GALLEGOS CANYON UNIT 134E
API NUMBER: 3004525222 TANK ID: 3004525222A
SECTION 17, TOWNSHIP 29.0N, RANGE 12W, P.M. NM23

FIGURE **1**

0	Q64: ▼	Q16:	Public Lan	d Surv	ey System	(PLSS		Rng: ▼					
0	x : 0	ft	State Plane C	Coordin	nate System Zone		027		V				
0	x : 0	ft	State Plane C	Coordir	nate System Zone		083		v				
•	Degrees/Minutes/Seconds • Longitude (X): Degrees: 108 • Minutes: 7 ' Seconds: "												
	Latitude (Y):		Degrees: 36			es: 3	,	Seconds: 22.	5 "				
0	Easting	(X):	0 m	UTM -	NAD27 Northing	(Y):	0	mtrs	Zone:				
				Su	ВМІТ								
	Al	II Conve	ersion Results a	re disp	layed as N/	AD 198	3 UTM Zoi	ne 13					
	Easting (X	(): 2216 4	18.82 mtrs		North	ing (Y):	4068664.72	mtrs					
		~~ Pl	ease keep screen o	pen to	copy UTM val	lues for	Reports. ~~	•					



New Mexico Office of the State Engineer Wells with Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 221648.82 Northing (Y): 4068664.72 Radius: 1609.3



New Mexico Office of the State Engineer Wells Without Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 221648.82 Northing (Y): 4068664.72 Radius: 1609.3



New Mexico Office of the State Engineer Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 221648.82

Northing (Y): 4068664.72

Radius: 1609.3

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a

(R=POD has been replaced, O=orphaned,

C=the file is water right file.) closed)

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

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD

Sub-QQQ

Depth Depth Water **Well Water Column**

POD Number SJ 01566

Code basin County 64 16 4 Sec Tws Rng 3 1 3 08 29N 12W

220538 4070446*

105 60

GPS Coordinates 36.738595,-108.129736 Average Depth to Water:

60 feet 60 feet 45

Minimum Depth: Maximum Depth:

60 feet

Record Count: 1

Basin/County Search:

Basin: San Juan

PLSS Search:

Q64: SW

Q16: NW

Q4: SW

Section(s): 8

Township: 29N

Range: 12W



New Mexico Office of the State Engineer **Point of Diversion Summary**

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

Well Tag

POD Number

Q64 Q16 Q4 Sec Tws Rng

X

SJ 01566

3 08 29N 12W

220538 4070446*

Driller License:

527

Driller Company: THOMPSON WELL DRILLING

Driller Name:

THOMPSON, LEON

Drill Start Date:

04/20/1983

Drill Finish Date:

04/25/1983

Plug Date:

Log File Date:

05/13/1983

PCW Rcv Date:

Shallow

Pump Type:

Pipe Discharge Size:

Source:

Casing Size:

5.00

Depth Well:

105 feet

Depth Water:

Estimated Yield: 5 GPM

60 feet

Water Bearing Stratifications:

Top Bottom Description

100

105 Sandstone/Gravel/Conglomerate

Casing Perforations:

Top Bottom

75

105