

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
July 21, 2008

**For temporary pits, closed-loop systems, and below-grade tanks,** submit to the appropriate NMOCD District Office.  
**For permanent pits and exceptions** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

99A

Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☐ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability 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: \_\_\_\_\_ OGRID #: \_\_\_\_\_  
Address: \_\_\_\_\_  
Facility or well name: \_\_\_\_\_  
API Number: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr \_\_\_\_\_ Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_ County: \_\_\_\_\_  
Center of Proposed Design: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983  
Surface Owner: ☐ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC  
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other \_\_\_\_\_  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_

4.  
☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** \_\_\_\_\_  
Volume: \_\_\_\_\_ bbl Type of fluid: \_\_\_\_\_  
Tank Construction material: \_\_\_\_\_  
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

5.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

- ☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
- ☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
- ☐ Alternate. Please specify \_\_\_\_\_

7.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
- ☐ Monthly inspections (If netting or screening is not physically feasible)

8.

**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 19.15.16.8 NMAC

9.

**Administrative Approvals and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

**Please check a box if one or more of the following is requested, if not leave blank:**

- ☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

**Instructions:** The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. ( <i>Applies to permanent pits</i> ) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

11.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_

☐ Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.

**Proposed Closure:** 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Closed-loop System ☐ Alternative

Proposed Closure Method: ☐ Waste Excavation and Removal

☐ Waste Removal (Closed-loop systems only)

☐ On-site Closure Method (Only for temporary pits and closed-loop systems)

☐ In-place Burial ☐ On-site Trench Burial

☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**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 indentify 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: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future 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

17.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is between 50 and 100 feet below the bottom of the buried waste

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is more than 100 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

18.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC

☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC

☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC

☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC

☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC

☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC

☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)

☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC

☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

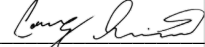
Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

20.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure ~~Plan (only)~~ ☐ OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 3/13/2020

Title: Environmental Specialist OCD Permit Number: 99A

21.

**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: \_\_\_\_\_

22.

**Closure Method:**

☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)  
☐ If different from approved plan, please explain.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please indentify 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: \_\_\_\_\_

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

24.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Proof of Closure Notice (surface owner and division)  
☐ Proof of Deed Notice (required for on-site closure)  
☐ Plot Plan (for on-site closures and temporary pits)  
☐ Confirmation Sampling Analytical Results (if applicable)  
☐ Waste Material Sampling Analytical Results (required for on-site closure)  
☐ Disposal Facility Name and Permit Number  
☐ Soil Backfilling and Cover Installation  
☐ Re-vegetation Application Rates and Seeding Technique  
☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

25.

**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: \_\_\_\_\_

22.

**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: \_\_\_\_\_



**BPX ENERGY**  
(formerly BP America Production Company)  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

**Gallegos Canyon Unit # 255 – Tank ID: A**

**API #: 3004511798**

**Unit Letter C, Section 18, T28N, R11W**

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BPX Energy (BPX) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BPX shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BPX shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BPX's NMOCD approved BGT design attached to the BPX Design and Construction Plan. BPX shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BPX's NMOCD approved BGT Design attached to the BPX Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BPX shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

**General Closure Plan**

1. BPX shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.

**Notice is attached.**

2. BPX shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.

**Notice was provided and documented in the attached email.**

3. BPX shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:

- a. BPX Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
- b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
- c. Basin Disposal, Permit NM-01-0005 (Liquids)
- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BPX Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BPX Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BPX Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BPX Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BPX Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BPX Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BPX Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

**All liquids and/or sludge within the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.**

4. BPX shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

**The BGT was transported for recycling.**

5. BPX shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

**All equipment associated with the BGT has been removed.**

6. BPX shall test the soils beneath the BGT to determine whether a release has occurred. BPX shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method	Release Verification (mg/Kg)	Composite Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.0250
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.0250
TPH	US EPA Method SW-846 418.1	100	<50
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<20

Notes: mg/Kg = milligram per kilogram, pcs = point composite sample, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

**Soils beneath the BGT were sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are attached.**

7. BPX shall notify the division District III office of its results on form C-141.
- C-141 is attached.**
8. If it is determined that a release has occurred, then BPX will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

**Sampling results reveal no evidence of a release had occurred.**

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BPX shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area.

**Sampling results reveal no evidence of a release had occurred. BGT area has been backfilled with clean, earthen material after remedial activity has been completed.**

10. BPX shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BPX shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**



11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.  
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**
12. BPX shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.  
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**
13. BPX shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.  
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BPX shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.  
**BPX will notify NMOCD when re-vegetation is successfully completed.**
15. Within 60 days of closure completion, BPX shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.**Closure report on C-144 form is included & contains a photo of the current reclamation requirements completed.**
16. BPX shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.  
**Certification section of C-144 has been completed.**

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  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural  
Resources Department

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party <b>BPX Energy</b> (formerly BP America Production Co.)	OGRID <b>778</b>
Contact Name <b>Steve Moskal</b>	Contact Telephone <b>(505) 330-9179</b>
Contact email <b>Steven.Moskal@bpx.com</b>	Incident # (assigned by OCD)
Contact mailing address <b>1199 Main Ave., Suite 101, Durango, CO 81301</b>	

### Location of Release Source

Latitude **36.66650** Longitude **-108.04770**  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name <b>GALLEGOS CANYON UNIT 255</b>	Site Type <b>Natural Gas Well</b>
Date Release Discovered	API# (if applicable) <b>30-045-11798</b>

Unit Letter	Section	Township	Range	County
<b>C</b>	<b>18</b>	<b>28N</b>	<b>11W</b>	<b>San Juan</b>

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **TPH, BTEX, & chloride all below below-grade tank (BGT) permit closure standards. No evidence of a release had occurred.**

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  <b>Not required.</b>	

### Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: <u>Steve Moskal</u>	Title: <u>Environmental Coordinator</u>
Signature: _____	Date: _____
email: <u>Steve.Moskal@bpx.com</u>	Telephone: <u>(505) 330-9179</u>
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

## BP Pit Closure Notification – Gallegos Canyon Unit 255

---

From: Patti Campbell (BPX)  
To: Smith, Cory, EMNRD  
Cc: Steven Moskal (BPX), Erin Dunman (BPX), Nelson Velez, Jeffrey Blagg, Josh Mihlich (BPX)  
Date: Tuesday, November 19, 2019 10:30:207 AM MDT

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SENT VIA E-MAIL TO: [CORY.SMITH@STATE.NM.US](mailto:CORY.SMITH@STATE.NM.US); [VANESSA.FIELD@STATE.NM.US](mailto:VANESSA.FIELD@STATE.NM.US)

November 19, 2019

New Mexico Oil Conservation Division  
1000 Rio Brazos Road  
Aztec, New Mexico 87410

**RE: Notice of Proposed Below-Grade Tank (BGT) Closure**

Gallegos Canyon Unit 255  
API 30-045-11798  
(C) Section 18 – T28N – R11W  
San Juan County, New Mexico

Dear Mr. Cory Smith,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95 bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around November 22, 2019.

Should you have any questions, please feel free to contact BP.

Sincerely,

**Patti Campbell**  
Regulatory Analyst  
BP America Production Company  
BPX Energy Inc.  
(970) 712-5997  
[patti.campbell@bpx.com](mailto:patti.campbell@bpx.com)





BP America Production Company  
1199 Main Ave., Suite 101  
Durango, CO 81303

November 19, 2019

Navajo Land Department  
2B Taylor Rd, Bldg #8966  
St. Michaels, AZ 86511

**VIA CERTIFIED MAIL**

Re: Notification of plans to close/remove a below grade tank  
Well Name: GALLEGOS CANYON UNIT 255  
API# - 3004507785

Dear Sir or Madame,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about November 22, 2019. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required, please contact Steve Moskal on (505)-330-9179 or Erin Dunman on (281) 810-2578 for a specific time.

Sincerely,

*Patti Campbell*

Patti Campbell  
BPX – San Juan  
Regulatory Analyst

CLIENT: 

BPX

BLAGG ENGINEERING, INC.  
P.O. BOX 87, BLOOMFIELD, NM 87413  
(505) 632-1199

API #: 3004511798  
TANK ID (if applicable): A

FIELD REPORT:

(circle one): 

BGT CONFIRMATION

 / RELEASE INVESTIGATION / OTHER:

PAGE #: 1 of 1

SITE INFORMATION:

SITE NAME: GCU # 255

QUAD/UNIT: C SEC: 18 TWP: 28N RNG: 11W PM: NM CNTY: SJ ST: NM

1/4 -1/4/FOOTAGE: 990'N / 1,850'W NE/NW LEASE TYPE: FEDERAL STATE FEE / INDIAN

LEASE #: E-2447-3 PROD. FORMATION: FT CONTRACTOR: KELLEY O.F.S. BPX - J. MIHELICH

DATE STARTED: 11/22/19

DATE FINISHED:

ENVIRONMENTAL SPECIALIST(S): NJV

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.66674 X 108.04778 GL ELEV.: 5,480'

1) 95 BGT (SW/DB) GPS COORD.: 36.66650 X 108.04770 DISTANCE/BEARING FROM W.H.: 98', S15E

2) GPS COORD.: DISTANCE/BEARING FROM W.H.:

3) GPS COORD.: DISTANCE/BEARING FROM W.H.:

4) GPS COORD.: DISTANCE/BEARING FROM W.H.:

SAMPLING DATA:

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL

1) SAMPLE ID: 5PC - TB @ 6' (95) SAMPLE DATE: 11/22/19 SAMPLE TIME: 1105 LAB ANALYSIS: 8015B/8021B/300.0 (CI) OVM READING (ppm): NA

2) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

4) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

5) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

SOIL DESCRIPTION:

SOIL TYPE: SAND SILTY SAND SILT / SILTY CLAY / CLAY / GRAVEL / OTHER

SOIL COLOR: DARK YELLOWISH ORANGE

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE

DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

CONSISTENCY (NON COHESIVE SOILS): LOOSE FIRM DENSE / VERY DENSE

HC ODOR DETECTED: YES NO EXPLANATION -

MOISTURE: DRY SLIGHTLY MOIST MOIST / WET / SATURATED / SUPER SATURATED

SAMPLE TYPE: GRAB COMPOSITE # OF PTS. 5

ANY AREAS DISPLAYING WETNESS: YES NO EXPLANATION -

DISCOLORATION/STAINING OBSERVED: YES NO EXPLANATION -

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES NO EXPLANATION -

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES NO EXPLANATION:

EQUIPMENT SET OVER RECLAIMED AREA: YES NO EXPLANATION -

OTHER: NMOCD REP. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING.

EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): NA

DEPTH TO GROUNDWATER: <50' NEAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: < 300' NMOCD TPH CLOSURE STD: 100 ppm

SITE SKETCH

BGT Located : off on site

PLOT PLAN circle: attached

OVM CALIB. READ. = NA ppm RF=1.00

OVM CALIB. GAS = NA ppm

TIME: NA am/pm DATE: NA

MISCELL. NOTES

PO #: 4301108996

AFF #:

SIO #:

GL #:

Permit date(s): 06/10/10

OCD Appr. date(s): 01/22/18

Tank ID OVM = Organic Vapor Meter ppm = parts per million

A BGT Sidewalls Visible: Y / (N)

BGT Sidewalls Visible: Y / N

BGT Sidewalls Visible: Y / N

Magnetic declination: 10° E

X - S.P.D.

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

NOTES: GOOGLE EARTH IMAGERY DATE: 4/6/2019.

ONSITE: 11/22/19

revised: 11/26/13

BEI1005E-6.SKF





BP America Production Co.	Project Name:	GCU #255	
PO Box 22024	Project Number:	03143-0424	<b>Reported:</b>
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	11/26/19 11:15

**5PC - TB @ 6' (95)****P911114-01 (Solid)**

Reporting									
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes

**Volatile Organics by EPA 8021**

Benzene	ND	0.0250	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
Toluene	ND	0.0250	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
Ethylbenzene	ND	0.0250	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
p,m-Xylene	ND	0.0500	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
o-Xylene	ND	0.0250	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
Total Xylenes	ND	0.0250	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8021B	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		101 %		50-150	1947051	11/22/19	11/22/19	EPA 8021B	

**Nonhalogenated Organics by 8015 - DRO/ORO**

Diesel Range Organics (C10-C28)	ND	25.0	mg/kg	1	1947050	11/22/19	11/25/19	EPA 8015D	
Oil Range Organics (C28-C40)	ND	50.0	mg/kg	1	1947050	11/22/19	11/25/19	EPA 8015D	
<i>Surrogate: n-Nonane</i>		89.6 %		50-200	1947050	11/22/19	11/25/19	EPA 8015D	

**Nonhalogenated Organics by 8015 - GRO**

Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg	1	1947051	11/22/19	11/22/19	EPA 8015D	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		88.7 %		50-150	1947051	11/22/19	11/22/19	EPA 8015D	

**Anions by 300.0/9056A**

Chloride	ND	20.0	mg/kg	1	1947046	11/22/19	11/22/19	EPA 300.0/9056A	
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## Analytical Report

### Report Summary

Client: BP America Production Co.

Samples Received: 11/22/2019

Job Number: 03143-0424

Work Order: P911114

Project Name/Location: GCU #255

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a light blue horizontal line.

Date: 11/26/19

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.  
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.  
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.



BP America Production Co.  
PO Box 22024  
Tulsa OK, 74121-2024

Project Name: GCU #255  
Project Number: 03143-0424  
Project Manager: Steve Moskal

**Reported:**  
11/26/19 11:15

### Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5PC - TB @ 6' (95)	P911114-01A	Soil	11/22/19	11/22/19	Glass Jar, 4 oz.

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BP America Production Co.	Project Name:	GCU #255	
PO Box 22024	Project Number:	03143-0424	<b>Reported:</b>
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	11/26/19 11:15

## Volatile Organics by EPA 8021 - Quality Control

## Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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## Batch 1947051 - Purge and Trap EPA 5030A

## Blank (1947051-BLK1)

Prepared &amp; Analyzed: 11/22/19 1

Benzene	ND	0.0250	mg/kg							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	"							
p,m-Xylene	ND	0.0500	"							
o-Xylene	ND	0.0250	"							
Total Xylenes	ND	0.0250	"							

Surrogate: 4-Bromochlorobenzene-PID 8.05 " 8.00 101 50-150

## LCS (1947051-BS1)

Prepared &amp; Analyzed: 11/22/19 1

Benzene	4.39	0.0250	mg/kg	5.00		87.7	70-130			
Toluene	4.69	0.0250	"	5.00		93.8	70-130			
Ethylbenzene	4.74	0.0250	"	5.00		94.9	70-130			
p,m-Xylene	9.46	0.0500	"	10.0		94.6	70-130			
o-Xylene	4.76	0.0250	"	5.00		95.2	70-130			
Total Xylenes	14.2	0.0250	"	15.0		94.8	70-130			

Surrogate: 4-Bromochlorobenzene-PID 8.15 " 8.00 102 50-150

## Matrix Spike (1947051-MS1)

Source: P911113-01

Prepared &amp; Analyzed: 11/22/19 1

Benzene	4.46	0.0250	mg/kg	5.00	ND	89.2	54.3-133			
Toluene	4.83	0.0250	"	5.00	ND	96.5	61.4-130			
Ethylbenzene	4.87	0.0250	"	5.00	ND	97.5	61.4-133			
p,m-Xylene	9.70	0.0500	"	10.0	ND	97.0	63.3-131			
o-Xylene	4.83	0.0250	"	5.00	ND	96.6	63.3-131			
Total Xylenes	14.5	0.0250	"	15.0	ND	96.9	63.3-131			

Surrogate: 4-Bromochlorobenzene-PID 8.27 " 8.00 103 50-150

## Matrix Spike Dup (1947051-MSD1)

Source: P911113-01

Prepared &amp; Analyzed: 11/22/19 1

Benzene	4.43	0.0250	mg/kg	5.00	ND	88.5	54.3-133	0.688	20	
Toluene	4.80	0.0250	"	5.00	ND	96.0	61.4-130	0.572	20	
Ethylbenzene	4.83	0.0250	"	5.00	ND	96.6	61.4-133	0.969	20	
p,m-Xylene	9.62	0.0500	"	10.0	ND	96.2	63.3-131	0.824	20	
o-Xylene	4.78	0.0250	"	5.00	ND	95.6	63.3-131	1.03	20	
Total Xylenes	14.4	0.0250	"	15.0	ND	96.0	63.3-131	0.892	20	

Surrogate: 4-Bromochlorobenzene-PID 8.16 " 8.00 102 50-150

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BP America Production Co.	Project Name:	GCU #255	
PO Box 22024	Project Number:	03143-0424	<b>Reported:</b>
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	11/26/19 11:15

### Nonhalogenated Organics by 8015 - DRO/ORO - Quality Control

#### Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 1947050 - DRO Extraction EPA 3570

##### Blank (1947050-BLK1)

Prepared: 11/22/19 1 Analyzed: 11/25/19 1

Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Oil Range Organics (C28-C40)	ND	50.0	"							
Surrogate: n-Nonane	48.3		"	50.0		96.5	50-200			

##### LCS (1947050-BS1)

Prepared: 11/22/19 1 Analyzed: 11/25/19 1

Diesel Range Organics (C10-C28)	482	25.0	mg/kg	500		96.3	38-132			
Surrogate: n-Nonane	50.1		"	50.0		100	50-200			

##### Matrix Spike (1947050-MS1)

Source: P911105-01

Prepared: 11/22/19 1 Analyzed: 11/25/19 1

Diesel Range Organics (C10-C28)	470	25.0	mg/kg	500	ND	94.0	38-132			
Surrogate: n-Nonane	48.4		"	50.0		96.8	50-200			

##### Matrix Spike Dup (1947050-MSD1)

Source: P911105-01

Prepared: 11/22/19 1 Analyzed: 11/25/19 1

Diesel Range Organics (C10-C28)	481	25.0	mg/kg	500	ND	96.2	38-132	2.33	20	
Surrogate: n-Nonane	48.4		"	50.0		96.7	50-200			

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BP America Production Co.	Project Name:	GCU #255	
PO Box 22024	Project Number:	03143-0424	<b>Reported:</b>
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	11/26/19 11:15

## Nonhalogenated Organics by 8015 - GRO - Quality Control

## Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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## Batch 1947051 - Purge and Trap EPA 5030A

## Blank (1947051-BLK1)

Prepared &amp; Analyzed: 11/22/19 1

Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg							
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.97		"	8.00		87.2	50-150			

## LCS (1947051-BS2)

Prepared &amp; Analyzed: 11/22/19 1

Gasoline Range Organics (C6-C10)	50.4	20.0	mg/kg	50.0		101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.07		"	8.00		88.4	50-150			

## Matrix Spike (1947051-MS2)

Source: P911113-01

Prepared &amp; Analyzed: 11/22/19 1

Gasoline Range Organics (C6-C10)	52.4	20.0	mg/kg	50.0	ND	105	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.16		"	8.00		89.5	50-150			

## Matrix Spike Dup (1947051-MSD2)

Source: P911113-01

Prepared: 11/22/19 1 Analyzed: 11/22/19 2

Gasoline Range Organics (C6-C10)	51.3	20.0	mg/kg	50.0	ND	103	70-130	2.20	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.08		"	8.00		88.5	50-150			

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BP America Production Co.	Project Name:	GCU #255	
PO Box 22024	Project Number:	03143-0424	<b>Reported:</b>
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	11/26/19 11:15

**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
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**Batch 1947046 - Anion Extraction EPA 300.0/9056A****Blank (1947046-BLK1)**

Prepared &amp; Analyzed: 11/22/19 0

Chloride	ND	20.0	mg/kg							
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**LCS (1947046-BS1)**

Prepared: 11/22/19 0 Analyzed: 11/22/19 1

Chloride	236	20.0	mg/kg	250		94.4	90-110			
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**Matrix Spike (1947046-MS1)****Source: P911104-01**

Prepared: 11/22/19 0 Analyzed: 11/22/19 1

Chloride	511	20.0	mg/kg	250	257	101	80-120			
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**Matrix Spike Dup (1947046-MSD1)****Source: P911104-01**

Prepared: 11/22/19 0 Analyzed: 11/22/19 1

Chloride	531	20.0	mg/kg	250	257	110	80-120	3.88	20	
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**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 may differ slightly.

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BP America Production Co.	Project Name:	GCU #255	<b>Reported:</b> 11/26/19 11:15
PO Box 22024	Project Number:	03143-0424	
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	

### Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

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

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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