

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.

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: BP AMERICA PRODUCTION COMPANY OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: GALLEGOS CANYON UNIT COM 094
API Number: 3004508057 OCD Permit Number: _____
U/L or Qtr/Qtr F Section 23.0 Township 29.0N Range 13W County: San Juan County
Center of Proposed Design: Latitude 36.71379 Longitude -108.17786 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 _____

RCVD JAN 7 '14
OIL CONS. DIV.
DIST. 3

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 (Closure Plan submittal only)
Volume: 95.0 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☐ 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 _____

Tank B

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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - 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. (Applies to permanent pits) - 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 H₂S, 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 identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ 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): Jeffrey PeaceTitle: Field Environmental AdvisorSignature: Jeffrey H. PeaceDate: 06/14/2010e-mail address: Peace.Jeffrey@bp.comTelephone: 505-326-9479

20.

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

OCD Representative Signature: Jonathan KellyApproval Date: 5/10/11Title: Environmental EngineerOCD Permit Number: 118/2014

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: 10-28-2013

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 identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____

Disposal Facility Permit Number: _____

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 36.71379Longitude -108.17786NAD: ☐ 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): Jeff PeaceTitle: Field Environmental AdvisorSignature: Jeff PeaceDate: January 6, 2014e-mail address: peace.jeffrey@bp.comTelephone: (505) 326-9479

District I
1625 N. French Dr., Hobbs, NM 88240
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State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: Gallegos Canyon Unit Com 94	Facility Type: Natural gas well

Surface Owner: Private	Mineral Owner: Federal	API No. 3004508057
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LOCATION OF RELEASE

Unit Letter F	Section 23	Township 29N	Range 13W	Feet from the 1,850	North/South Line North	Feet from the 1,850	East/West Line West	County: San Juan
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Latitude 36.71379 Longitude 108.17786

NATURE OF RELEASE


Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tank -- 95 bbl Tank "B"	Date and Hour of Occurrence:	Date and Hour of Discovery:
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chloride below standards. Groundwater under the BGT was also sampled, with BTEX below standards. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. The excavated area was backfilled and compacted and is still within the active well area.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOC 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 NMOC marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOC 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.

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Jeff Peace	Approved by Environmental Specialist:		
Title: Field Environmental Advisor	Approval Date:	Expiration Date:	
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: January 6, 2014	Phone: 505-326-9479		

* Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004508057 TANK ID (if applicable): A & B
FIELD REPORT: (circle one): <u>BGT CONFIRMATION</u> / RELEASE INVESTIGATION / OTHER:		PAGE #: 1 of 1
SITE INFORMATION: SITE NAME: GCU COM #94 QUAD/UNIT: F SEC: 23 TWP: 29N RNG: 13W PM: NM CNTY: SJ ST: NM 1/4 -1/4 FOOTAGE: 1,850'N / 1,850'W SE/NW LEASE TYPE: FEDERAL / STATE / FEE / INDIAN LEASE #: - PROD. FORMATION: DK CONTRACTOR: ELKHORN MBF - K. AMBROSE		DATE STARTED: 10/28/13 DATE FINISHED: _____ ENVIRONMENTAL SPECIALIST(S): NJV
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.71396 X 108.17828 GL ELEV.: 5,278' 1) 95 BGT (SW/DB) - A GPS COORD.: 36.71366 X 108.17793 DISTANCE/BEARING FROM W.H.: 171', S38E 2) 95 BGT (SW/DB) - B GPS COORD.: 36.71379 X 108.17786 DISTANCE/BEARING FROM W.H.: 147.5', S55.5E 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		OVM READING (ppm)
1) SAMPLE ID: GW @ 5' (95) - A SAMPLE DATE: 10/28/13 SAMPLE TIME: 1100 LAB ANALYSIS: 8021B/300.1(CI)		NA
2) SAMPLE ID: 4 PC-SW @ 2'-3' (95) - A SAMPLE DATE: 10/28/13 SAMPLE TIME: 1105 LAB ANALYSIS: 418.1/8015B/8021B/300.0(CI)		NA
3) SAMPLE ID: GW @ 5' (95) - B SAMPLE DATE: 10/28/13 SAMPLE TIME: 1015 LAB ANALYSIS: 8021B/300.1(CI)		NA
4) SAMPLE ID: 4PC-SW @ 2'-3' (95) - B SAMPLE DATE: 10/28/13 SAMPLE TIME: 1020 LAB ANALYSIS: 418.1/8015B/8021B/300.0(CI)		NA
SOIL DESCRIPTION: SOIL TYPE: <u>SAND / SILTY SAND</u> SILT / SILTY CLAY / CLAY / GRAVEL / OTHER _____ SOIL COLOR: PALE TO DARK YELLOWISH ORANGE COHESION (ALL OTHERS): <u>NON COHESIVE</u> SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): <u>LOOSE / FIRM</u> DENSE / VERY DENSE MOISTURE: DRY <u>SLIGHTLY MOIST / MOIST / WET</u> SATURATED / SUPER SATURATED SAMPLE TYPE: <u>GRAB / COMPOSITE</u> # OF PTS. 4 DISCOLORATION/STAINING OBSERVED: YES / <u>NO</u> EXPLANATION - _____ ANY AREAS DISPLAYING WETNESS: <u>YES</u> / NO EXPLANATION - GROUNDWATER EXPOSED AT 5 FT. BELOW GRADE. APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / <u>NO</u> EXPLANATION: _____ ADDITIONAL COMMENTS: _____		
SOIL IMPACT DIMENSION ESTIMATION: <u>NA</u> ft. X <u>NA</u> ft. X <u>NA</u> ft. EXCAVATION ESTIMATION (Cubic Yards): <u>NA</u> DEPTH TO GROUNDWATER: <u><50'</u> NEAREST WATER SOURCE: <u>>1,000'</u> NEAREST SURFACE WATER: <u><1,000'</u> NMOC DTPH CLOSURE STD: 100 ppm		
SITE SKETCH <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> </div> <div style="width: 45%;"> PLOT PLAN circle: <u>attached</u> </div> </div>		
<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> 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. </div> <div style="width: 35%;"> MISCELL. NOTES WO: N15362921 PO #: _____ PK: ZEVH01BGT2 PJ #: Z2-006Q0 Permit date(s): 06/14/10 OCD Appr. date(s): 05/10/11 Tank ID: OVM = Organic Vapor Meter ppm = parts per million A BGT Sidewalls Visible: Y / <u>N</u> B BGT Sidewalls Visible: Y / <u>N</u> BGT Sidewalls Visible: Y / N Magnetic declination: 10° E </div> </div>		
NOTES: GOOGLE EARTH IMAGERY: 6/10/11 ONSITE: 10/28/13		

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1310E00

Date Reported: 11/6/2013

CLIENT: Blagg Engineering

Client Sample ID: GW @ 5' (95)-B

Project: GCU COM #94

Collection Date: 10/28/2013 10:15:00 AM

Lab ID: 1310E00-003

Matrix: AQUEOUS

Received Date: 10/30/2013 9:44:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	1.0		µg/L	1	11/1/2013 3:00:50 PM	R14530
Toluene	ND	1.0		µg/L	1	11/1/2013 3:00:50 PM	R14530
Ethylbenzene	1.0	1.0		µg/L	1	11/1/2013 3:00:50 PM	R14530
Xylenes, Total	8.6	2.0		µg/L	1	11/1/2013 3:00:50 PM	R14530
Surr: 4-Bromofluorobenzene	105	85-136		%REC	1	11/1/2013 3:00:50 PM	R14530
EPA METHOD 300.0: ANIONS							Analyst: JRR
Chloride	61	5.0		mg/L	10	10/30/2013 6:30:48 PM	R14472

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

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1310E00

Date Reported: 11/6/2013

CLIENT: Blagg Engineering

Client Sample ID: 4PC-SW @ 2'-3' (95)-B

Project: GCU COM #94

Collection Date: 10/28/2013 10:20:00 AM

Lab ID: 1310E00-004

Matrix: SOIL

Received Date: 10/30/2013 9:44:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: BCN
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	11/1/2013 5:39:40 PM	10124
Surr: DNOP	98.1	66-131		%REC	1	11/1/2013 5:39:40 PM	10124
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	10/31/2013 3:58:51 PM	10112
Surr: BFB	98.4	74.5-129		%REC	1	10/31/2013 3:58:51 PM	10112
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.049		mg/Kg	1	10/31/2013 3:58:51 PM	10112
Toluene	ND	0.049		mg/Kg	1	10/31/2013 3:58:51 PM	10112
Ethylbenzene	ND	0.049		mg/Kg	1	10/31/2013 3:58:51 PM	10112
Xylenes, Total	ND	0.097		mg/Kg	1	10/31/2013 3:58:51 PM	10112
Surr: 4-Bromofluorobenzene	120	80-120		%REC	1	10/31/2013 3:58:51 PM	10112
EPA METHOD 300.0: ANIONS							Analyst: JRR
Chloride	ND	1.5		mg/Kg	1	11/4/2013 3:15:20 PM	10169
EPA METHOD 418.1: TPH							Analyst: JME
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	11/5/2013	10126

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

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	E Value above quantitation range	H Holding times for preparation or analysis exceeded
	J Analyte detected below quantitation limits	ND Not Detected at the Reporting Limit
	O RSD is greater than RSDlimit	P Sample pH greater than 2 for VOA and TOC only.
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S Spike Recovery outside accepted recovery limits	

Chain-of-Custody Record

Client: **BLAGG ENGR. / BP AMERICA**

Mailing Address: **P.O. BOX 87**
BLOOMFIELD, NM 87413

Phone #: **(505) 632-1199**

email or Fax#:

QA/QC Package:
☒ Standard ☐ Level 4 (Full Validation)

Accreditation:
☐ NELAP ☐ Other _____
☐ EDD (Type) _____

Turn-Around Time:

☒ Standard ☐ Rush _____

Project Name: **GCU COM #94**

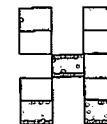
Project #:

Project Manager: **NELSON VELEZ**

Sampler: **NELSON VELEZ**

On Ice: ☒ Yes ☐ No

Sample Temperature: **1.0**



**HALL ENVIRONMENTAL
ANALYSIS LABORATORY**

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1310E00	BTEX + MTBE	BTEX + MTBB	TPH 8015B (C)	TPH (Metho	EDB (Metho	PAH (8310	RCRA 8 Me	Anions (F,Cl	8081 Pestic	8260B (VOA	8270 (Semi	Chloride (sol	Grab sampl	4 pt. compo
10/28/13	1100	WATER	GW @ 5' (95)-A	40 ml VOA - 2	HCl & Cool	-001	✓												✓	
10/28/13	1100	WATER	GW @ 5' (95)-A	500 ml - 1	Cool	-0021												✓	✓	
10/28/13	1105	SOIL	4PC - SW @ 2'-3' (95)-A	4 oz. - 1	Cool	-0032	✓		✓	✓								✓		✓
10/28/13	1015	WATER	GW @ 5' (95)-B	40 ml VOA - 2	HCl & Cool	-0043	✓												✓	
10/28/13	1015	WATER	GW @ 5' (95)-B	500 ml - 1	Cool	-0053												✓	✓	
10/28/13	1020	SOIL	4PC - SW @ 2'-3' (95)-B	4 oz. - 1	Cool	-0064	✓		✓	✓								✓		✓

Date: **10/29/13** Time: **832** Relinquished by: *[Signature]*

Date: **10/29/13** Time: **1740** Relinquished by: *[Signature]*

Date: **10/29/13** Time: **832** Received by: *[Signature]*

Date: **10/30/13** Time: **09:44** Received by: *[Signature]*

Remarks:

BILL DIRECTLY TO BP:

Jeff Peace, 200 Energy Court, Farmington, NM 87401

Work Order: **N15362921** Paykey: **ZEHV01BGT2**

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB-10169	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	10169	RunNo:	14556					
Prep Date:	11/4/2013	Analysis Date:	11/4/2013	SeqNo:	417936	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-10169	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	10169	RunNo:	14556					
Prep Date:	11/4/2013	Analysis Date:	11/4/2013	SeqNo:	417938	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	90.1	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBW	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415748	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	0.50								

Sample ID	LCS	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSW	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415749	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	4.8	0.50	5.000	0	95.6	90	110			

Sample ID	A4	SampType:	CCV_4	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415758	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	4.7	0.50	5.000	0	93.1	90	110			

Sample ID	A5	SampType:	CCV_5	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415770	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	7.7	0.50	8.000	0	96.7	90	110			

Sample ID	A6	SampType:	CCV_6	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415782	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	12	0.50	12.00	0	102	90	110			

Sample ID	A4	SampType:	CCV_4	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/30/2013	SeqNo:	415794	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	4.7	0.50	5.000	0	93.1	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	A6	SampType:	CCV_6	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/31/2013	SeqNo:	415806	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	12	0.50	12.00	0	102	90	110			

Sample ID	A4	SampType:	CCV_4	TestCode:	EPA Method 300.0: Anions					
Client ID:	BatchQC	Batch ID:	R14472	RunNo:	14472					
Prep Date:		Analysis Date:	10/31/2013	SeqNo:	415814	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	4.6	0.50	5.000	0	93.0	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB-10126	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	10126	RunNo:	14575					
Prep Date:	10/31/2013	Analysis Date:	11/5/2013	SeqNo:	418782	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID	LCS-10126	SampType:	LCS	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS	Batch ID:	10126	RunNo:	14575					
Prep Date:	10/31/2013	Analysis Date:	11/5/2013	SeqNo:	418783	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	95	20	100.0	0	95.1	80	120			

Sample ID	LCSD-10126	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID:	10126	RunNo:	14575					
Prep Date:	10/31/2013	Analysis Date:	11/5/2013	SeqNo:	418784	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	96	20	100.0	0	96.4	80	120	1.36	20	

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2 for VOA and TOC only. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB-10124	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	10124	RunNo:	14475					
Prep Date:	10/31/2013	Analysis Date:	10/31/2013	SeqNo:	416119	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	10		10.00		102	66	131			

Sample ID	LCS-10124	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	10124	RunNo:	14475					
Prep Date:	10/31/2013	Analysis Date:	10/31/2013	SeqNo:	416120	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	44	10	50.00	0	87.2	77.1	128			
Surr: DNOP	4.6		5.000		91.9	66	131			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB-10112	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	10112	RunNo:	14496					
Prep Date:	10/30/2013	Analysis Date:	10/31/2013	SeqNo:	416360	Units:	mg/Kg			
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		96.4	74.5	129			

Sample ID	LCS-10112	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	10112	RunNo:	14496					
Prep Date:	10/30/2013	Analysis Date:	10/31/2013	SeqNo:	416361	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	99.0	74.5	126			
Surr: BFB	1100		1000		105	74.5	129			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	MB-10112		SampType:	MBLK		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	PBS		Batch ID:	10112		RunNo:	14496			
Prep Date:	10/30/2013		Analysis Date:	10/31/2013		SeqNo:	416389		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.2		1.000		117	80	120			

Sample ID	LCS-10112		SampType:	LCS		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	LCSS		Batch ID:	10112		RunNo:	14496			
Prep Date:	10/30/2013		Analysis Date:	10/31/2013		SeqNo:	416390		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.97	0.050	1.000	0	96.6	80	120			
Toluene	1.0	0.050	1.000	0	100	80	120			
Ethylbenzene	0.99	0.050	1.000	0	99.4	80	120			
Xylenes, Total	3.0	0.10	3.000	0	101	80	120			
Surr: 4-Bromofluorobenzene	1.3		1.000		127	80	120			S

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2 for VOA and TOC only. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1310E00

06-Nov-13

Client: Blagg Engineering

Project: GCU COM #94

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBW	Batch ID:	R14530	RunNo:	14530					
Prep Date:		Analysis Date:	11/1/2013	SeqNo:	417482	Units:	µg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	1.0								
Toluene	ND	1.0								
Ethylbenzene	ND	1.0								
Xylenes, Total	ND	2.0								
Surr: 4-Bromofluorobenzene	21		20.00		105	85	136			

Sample ID	100NG BTEX LCS	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSW	Batch ID:	R14530	RunNo:	14530					
Prep Date:		Analysis Date:	11/1/2013	SeqNo:	417483	Units:	µg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	21	1.0	20.00	0	103	80	120			
Toluene	21	1.0	20.00	0	104	80	120			
Ethylbenzene	21	1.0	20.00	0	104	80	120			
Xylenes, Total	64	2.0	60.00	0	107	80	120			
Surr: 4-Bromofluorobenzene	22		20.00		108	85	136			

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2 for VOA and TOC only. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87105
TEL: 505-345-3975 FAX: 505-345-4101
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: BLAGG

Work Order Number: 1310E00

RcptNo: 1

Received by/date:	<i>MS</i>	<i>10/30/13</i>
Logged By:	Michelle Garcia	10/30/2013 9:44:00 AM
Completed By:	Michelle Garcia	10/30/2013 10:27:33 AM
Reviewed By:	<i>[Signature]</i>	<i>10/30/13</i>

Chain of Custody

- | | | | |
|--|---|-----------------------------|---|
| 1. Custody seals intact on sample bottles? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Not Present <input checked="" type="checkbox"/> |
| 2. Is Chain of Custody complete? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Not Present <input type="checkbox"/> |
| 3. How was the sample delivered? | Courier | | |

Log In

- | | | | |
|--|---|--|--|
| 4. Was an attempt made to cool the samples? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | NA <input type="checkbox"/> |
| 5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | NA <input type="checkbox"/> |
| 6. Sample(s) in proper container(s)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 7. Sufficient sample volume for indicated test(s)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 8. Are samples (except VOA and ONG) properly preserved? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 9. Was preservative added to bottles? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | NA <input type="checkbox"/> |
| 10. VOA vials have zero headspace? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | No VOA Vials <input checked="" type="checkbox"/> |
| 11. Were any sample containers received broken? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | |
| 12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 13. Are matrices correctly identified on Chain of Custody? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 14. Is it clear what analyses were requested? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 15. Were all holding times able to be met?
(If no, notify customer for authorization.) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |

of preserved bottles checked for pH: _____
(<2 or >12 unless noted)
Adjusted? _____
Checked by: _____

Special Handling (If applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

505-947-9900

BP AMERICA PRODUCTION COMPANY
GALLEGOS CANYON UNIT COM 094
API 3004508057 LEASE FEE
1850 FNL 1850 FWL (F) SEC 23 T29N R13W
San Juan County ELEV 5278
LAT 36° 42' 50.383"
LONG 108° 10' 41.578"



BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit Com 94 - Tank "B" BGT

API No. 3004508057

Unit Letter F, Section 23, T29N, R13W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP 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. BP 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 BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP 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 BP NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP 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. BP 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.

No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT replaced with LPT, but realizes notice is required for any BGT closure. Closure notices will be made for all BGT closures from this point forward.

2. BP 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.

No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT replaced with LPT, but realizes notice is required for any BGT closure. Closure notices will be made for all BGT closures from this point forward.

3. BP 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:
- BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - Basin Disposal, Permit NM-01-0005 (Liquids)
 - Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP 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 to a storage area for sale and re-use.

5. BP 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. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP 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 95 bbl BGT	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

Notes: mg/Kg = milligram per kilogram, 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.

Soil under the BGT's was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached. Water under the BGT was also sampled and BTEX were below standards. Sampling results are attached.

7. BP 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 BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
Sampling results indicate no release occurred.
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP 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 within the active process area
The area under the BGT was backfilled with clean soil and is still within the active well area.
10. BP 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. BP 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.
The area over the 95 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.
11. The soil cover for closures where the BGT has been removed or remediated to the NMOC'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.
The area over the 95 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.
12. BP 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.

The area over the 95 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

13. BP 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.

BP will seed the area when the well is plugged and abandoned.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.

BP will notify NMOCD when re-vegetation is successful.

15. Within 60 days of closure completion, BP 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.

16. BP 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.