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

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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: Modification to an existing permit Closure plan only submitted for an existing permitted or non-permitted pit, closed below-grade tank, or proposed alternative method	ethod
Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alter Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, gr environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, re	ound water or the
1. Operator: BP AMERICA PRODUCTION COMPANY OGRID #: 778 Address: 200 Energy Court, Farmington, NM 87401 OGRID #: 778	
Facility or well name: HOWELL 001A API Number: 3004522248 U/L or Qtr/Qtr Section 20.0 Township 30.0N Range 08W County: San Juan Col	unty
Center of Proposed Design: Latitude 36.79456 Longitude -107.69407 NAD Surface Owner: I Federal I State Private I Tribal Trust or Indian Allotment NAD	: 1927 🗶 1983
Temporary: Drilling Workover UIL Permanent Emergency Cavitation P&A Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other) JAN 31 '12 CONS. DIV. DIST. 3
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 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 Other Difference Other Difference PVC Other Difference Difference	a permit or notice o
A. Image: Subsection I of 19.15.17.11 NMAC <u>Tank ID:</u> A Volume: <u>95.0</u> bbl Type of fluid: <u>Produced Water</u> Tank Construction material: <u>Steel</u>	
 Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls and liner Visible sidewalls only Other SINGLE WALLED DOUBLE BOTTOMED SIDE WALLS NOT Liner type: Thickness mil HDPE PVC Other 	VISIBLE
S. Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consider	aration of approval

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 <u>4' Hogwire with single barbed wire</u>

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

Screen Netting Other_

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Monthly inspections (If netting or screening is not physically feasible)

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

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

Sting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accel material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appro office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	opriate district approval.
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	🗷 Yes 🗋 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 	🗌 Yes 🗷 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 	☐ Yes ¥ No ☐ 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 	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 search; 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

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 19.15.17.12 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:
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
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 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 ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Errsion Control Plan Errsion Control Plan Errsion Control Plan
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. Image: 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 G of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

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16. <u>Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only</u> : (19.15.17.13. Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if	D NMAC)		
facilities are required.	more inun iwo		
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 se	rvice and operations?		
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	c		
^{17.} <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sou provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate dis considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	trict office or may be		
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.			

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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): Aleffrey Peace
Signature: Here Date: 06/14/2010
e-mail address: Peace.Jeffrey@bp.com Telephone: 505-326-9479
20. <u>OCD Approval:</u> Permit Application (including closure plan) Closure Plan (only) DCD Conditions (see attachment)
OCD Representative Signature:
Title: Frivingmental Frighter OCD Permit Number:
<u>Closure Report (required within 60 days of closure completion)</u> : 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.
Image: Closure Completion Date: - 22 - 20/3
 22. <u>Closure Method:</u> 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. <u>Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:</u> 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 <u>36.79456</u> Longitude <u>-167.69407</u> NAD: 1927 J 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 Peace Title: Field Environmental Advisor
Signature: Jeff Peace Date: January 29, 2014
Name (Print): Jeff Peace Title: Field Gavison mental Advisor Signature: Jeff Peace Date: January 29, 2014 c-mail address: peace.jeffrey@bp.com Telephone: (505) 326-9479

Form C-144

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Oil Conservation Division

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Page 5 of 5

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BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

<u>Howell 1A – Tank A (95 bbl)</u> <u>API No. 3004522248</u> <u>Unit Letter I, Section 20, T30N, R8W</u>

RCVD JAN 31'14 DIL CONS. DIV. DIST. 3

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 approve 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. Notice is attached.
- 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.
 - Notice is attached.
- 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:
 - a. BP 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. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. 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.

BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
 All againment associated with the BCT has been removed.

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	Release Verification	Sample
	Tank A – 95 bbl	(mg/Kg)	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
ТРН	US EPA Method SW-846 418.1	100	21
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 was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.

- BP shall notify the division District III office of its results on form C-141.
 C-141 is attached.
- 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 with in the active process area

The area under the BGT was backfilled with clean soil and is still within the active 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 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 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.

The area over the 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 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 revegetation.

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.

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**

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Santa Fe, NM 87505

Release Notification and Corrective Action

		OPERATOR	Initial Report	🛛 Final Report
Name of Company: BP		Contact: Jeff Peace		
Address: 200 Energy Court, Farmingt	on, NM 87401	Telephone No.: 505-326-9479		
Facility Name: Howell 1A		Facility Type: Natural gas well	·····	
Surface Owner: Federal	Mineral Ow	ner: Federal	API No. 30045222	248

LOCATION OF RELEASE

Unit Letter I	Section 20	Township 30N	Range 8W	Feet from the 1,850	North/South Line South	Feet from the 1,105	East/West Line East	County: San Juan
			l					

Latitude___36.79456 Longitude 107.69407

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 A	Date and Hour of Occurrence:	Date and Hour of Discovery:			
Was Immediate Notice Given?	If YES, To Whom?				
🗌 Yes 🔲 No 🖾 Not Required					
By Whom?	Date and Hour	· · · · · · · · · · · · · · · · · · ·			
Was a Watercourse Reached?	If YES, Volume Impacting the Wa	tercourse.			
☐ Yes ⊠ No		RCVD JAN 31'14			
If a Watercourse was Impacted, Describe Fully.*		OIL CONS. DIV. DIST. 3			
Describe Cause of Problem and Remedial Action Taken.* Sampling of the the BGT. Soil analysis resulted in TPH, BTEX and chloride below stands		ing removal to ensure no soil impacts from			
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 t regulations all operators are required to report and/or file certain release n public health or the environment. The acceptance of a C-141 report by th should their operations have failed to adequately investigate and remediat or the environment. In addition, NMOCD acceptance of a C-141 report of federal, state, or local laws and/or regulations.	otifications and perform corrective ac e NMOCD marked as "Final Report" e contamination that pose a threat to a	tions for releases which may endanger does not relieve the operator of liability ground water, surface water, human health			
Signature: Joff Peace	OIL CONSER	VATION DIVISION			
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				
Date: January 29, 2014 Phone: 505-326-9479					

* Attach Additional Sheets If Necessary

(A & B (IANK ID (if applicble):A & B (IANK ID (if applicble):A & B FIELD REPORT: (circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER: PAGE #:1 of SITE INFORMATION: SITE NAME: HOWELL #1A DATE STARTED: O2/22/13 DATE STARTED: DATE FINISHED:				
1/4 -1/4/FOOTAGE: 1,850'S/1,105'E NE/SE LEASE TYPE: FEDERAL STATE / FEE / INDIAN ENVIRONMENTAL LEASE #: SF 078578 PROD. FORMATION: MV CONTRACTOR: MBF - J. YEAGER SPECIALIST(S): NJV				
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.794879 X 107.694104 GL ELEV.: 5,749' 1) 95 BGT (SW/DB) - A GPS COORD.: 36.79456 X 107.49407 DISTANCE/BEARING FROM WH.: 109', Due S 2) 21 BGT (SW/DB) - B GPS COORD.: 36.79471 X 107.69431 DISTANCE/BEARING FROM WH.: 95.5', S48W 3) 300 BBL PROD. TANK GPS COORD.: 36.794645 X 107.694354 DISTANCE/BEARING FROM WH.: 112', S40W 4) GPS COORD.: GPS COORD.: DISTANCE/BEARING FROM WH.: 112', S40W				
SAMPLING DATA: CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL				
1) SAMPLE ID: 5PC-TB @ 5' (95) SAMPLE DATE: 02/22/13 SAMPLE TIME: 1005 LAB ANALYSIS: 418.1/8015B/8021B/300.0(CI) NA 2) SAMPLE ID: 5PC-TB @ 7' (21) SAMPLE DATE: 02/22/13 SAMPLE TIME: 1000 LAB ANALYSIS: 418.1/8015B/8021B/300.0(CI) NA 3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: LAB ANALYSIS: LAB ANALYSIS:				
4) SAMPLE ID:				
SOIL COLOR: MODERATE BROWN COHESION (ALL OTHERS): NON COHESIVE' SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSE MOISTURE: DRY (SLIGHTLY MOIST / WET / SATURATED / SUPER SATURATED SAMPLE TYPE: GRAB COMPOSITE - # OF PTS DISCOLORATION/STAINING OBSERVED: YES (NO EXPLANATION ANY AREAS DISPLAYING WETNESS: YES (NO EXPLANATION APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED : YES /NO 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>>,000'</u> NEAREST SURFACE WATER: <u><1,000'</u> NMOCD TPH CLOSURE STD: <u>100</u> ppm				
SITE SKETCH PBGTL T.B 7' B.G. 300 BBL PROD. TANK PROD. TANK SERM DEHY.? BERM DEHY.? BERM DEHY.? BERM DEHY.? DEHY.? BERM DEHY.? DE				
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; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM. TRAVEL NOTES: CALLOUT:				

.

Analytical Report

Lab Order 1302853

Date Reported: 3/1/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering Client Sample ID: 5PC-TB@5'(95) **Project:** Howell #1A Collection Date: 2/22/2013 10:05:00 AM 1302853-002 Matrix: SOIL Lab ID: Received Date: 2/26/2013 10:00:00 AM . . -. **.**... ~ _ .

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RAN				Analyst: MMD	
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	2/28/2013 5:40:34 PM
Surr: DNOP	109	72.4-120	%REC	1	2/28/2013 5:40:34 PM
EPA METHOD 8015B: GASOLINE R	ANGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	2/27/2013 11:16:09 PM
Surr: BFB	106	84-116	%REC	1	2/27/2013 11:16:09 PM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.047	mg/Kg	1	2/27/2013 11:16:09 PM
Toluene	ND	0.047	mg/Kg	1	2/27/2013 11:16:09 PM
Ethylbenzene	ND	0.047	mg/Kg	1	2/27/2013 11:16:09 PM
Xylenes, Total	ND	0.095	mg/Kg	1	2/27/2013 11:16:09 PM
Surr: 4-Bromofluorobenzene	105	80-120	%REC	1	2/27/2013 11:16:09 PM
EPA METHOD 300.0: ANIONS					Analyst: JRR
Chloride	ND	7.5	mg/Kg	5	2/27/2013 11:46:44 AM
EPA METHOD 418.1: TPH					Analyst: LRW
Petroleum Hydrocarbons, TR	21	20	mg/Kg	1	2/27/2013

Qualifiers:	*	Value exceeds Maximum Contaminant Level.
	Е	Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH greater than 2

RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S Spike Recovery outside accepted recovery limits

C	hain-c	of-Cus	stody Record	Turn-Around 7	lime:			-		ŀ	-14		E	NV	/TF	20	N	ME	:N7	ГА	L	
Client:	BLAG	G ENGR.	/ BP AMERICA	Standard	🗌 Rush																	,
				Project Name:	· · · · · · · · · · · · · · · · · · ·			(- ₉ .		-		w.ha							•••		~ -	
Mailing A	ddress:	P.O. BO	X 87		HOWELL #	1A		49	01 F	ławł		NE -							9			
		BLOOM	FIELD, NM 87413	Project #:								975		-	505-							
Phone #:		(505) 63	32-1199					41. 1910 -				~ µ	hal	ysis	Rec	lues	, ter : :	(e	1.4.5. 4 M	£	18 	
email or F	ax#:		······································	Project Manag	jer:																П	Γ
QA/QC Pa	_		Level 4 (Full Validation)		NELSON VI	ELEZ	21B)	(ylnc	Diesel)					04, SO4)	PCB's							
Accredital				Sampler:	NELSON VI	ELEZ	, (8021B)	Gas (Gas/					02, F	12 PC						đ	
		Other			X Yes.			+ TPH (Gas only)	L5B (8.1)	4.1)	(H)		3, N	/ 8082		_				e sar	
	Гуре)			Sample Temp	erature: 🦷	7	E	E + 1	801	d 41	d 50	or PAH)	als	I, NC	des ,	~	VOA	0.0		e	osit	:
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL NO. 1309853	BTEX + -MTB	BTEX + MTBE	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or	RCRA 8 Metals	Anions (F, Cl, NO3, NO2, PO4,	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	Chloride (300.0)		Grab sample	5 pt. composite sample	.
2/22/13	1000	SOIL	5PC-TB @ 7' (21)	4 oz 2	Cool	-001	٧		V									٧			۷	Γ
				[Γ
2/22/13	1005	SOIL	5PC-TB @ 5' (95)	4 oz 2	Cool	-002	V		V	V				_				V			V	F
				f																		Γ
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Date:	Time;	Relinquish	ed by:	Received by:	I	Date Time	Ren	nark	s:	TP	1 (8	0158	3) - (GRC	8	ORO	ON	LY.		l.	l	-
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Date:	Time:	Relinquish	ed by: U	Received by:	115	Date Time						gy Co			-							
725/13	1725	Chris	tan Waller	July 1	Ha	02/24/13/000	W	ork C	order		<u>N1</u>	5075	<u>501</u>		Pay	/key:	<u>Z</u>	<u>EVH</u> (01BG	<u>iT2</u>	 	

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QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1302853

01-Mar-13

Client: Project:	Blagg En Howell #										
Sample ID	MB-6262	SampT	ype: ME	BLK	Tes	tCode: E	PA Method	300.0: Anion	s		
Client ID:	PBS	Batch	ID: 62	62	F	RunNo: 8	876				
Prep Date:	2/27/2013	Analysis D	ate: 2/	27/2013	S	SeqNo: 2	53705	Units: mg/K	(g		
Analyte Chloride	. <u> </u>	Result ND	PQL 1.5	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
										·	
Sample ID	LCS-6262	SampT	ype: LC	S	Tes	tCode: E	PA Method	300.0: Anion	s		
Client ID:	LCSS	Batch	ID: 62	62	F	RunNo: 8	876				
Prep Date:	2/27/2013	Analysis D	ate: 2/	27/2013	5	SeqNo: 2	53706	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		14	1.5	15.00	0	94.8	90	110			
Sample ID	1302868-001AMS	SampT	ype: MS	6	Tes	tCode: E	PA Method	300.0: Anion	s		
Client ID:	BatchQC	Batch	ID: 62	62	F	RunNo: 8	876				
Prep Date:	2/27/2013	Analysis D	ate: 2/	27/2013	S	SeqNo: 2	53708	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		15	7.5	15.00	2.762	80.4	64.4	117			
Sample ID	1302868-001AMSI	D SampT	ype: M \$	SD	Tes	tCode: E	PA Method	300.0: Anion	s		
Client ID:	BatchQC	Batch	ID: 62	62	F	RunNo: 8	876				
Prep Date:	2/27/2013	Analysis D	ate: 2/	27/2013	S	SeqNo: 2	53709	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		15	7.5	15.00	2.762	83.9	64.4	117	3.45	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
 - R RPD outside accepted recovery limits

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1302853

01-Mar-13

	; Engineering #1 A			
Sample ID MB-6252	SampType: MBLK	TestCode: EPA Method	418.1: TPH	
Client ID: PBS	Batch ID: 6252	RunNo: 8878		
Prep Date: 2/26/2013	Analysis Date: 2/27/2013	SeqNo: 253779	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-6252	SampType: LCS	TestCode: EPA Method	418.1: TPH	
Client ID: LCSS	Batch ID: 6252	RunNo: 8878		
Prep Date: 2/26/2013	Analysis Date: 2/27/2013	SeqNo: 253780	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Petroleum Hydrocarbons, TR	100 20 100.0	7.440 93.6 80	120	
Sample ID LCSD-6252	SampType: LCSD	TestCode: EPA Method	418.1: TPH	
Client ID: LCSS02	Batch ID: 6252	RunNo: 8878		
Prep Date: 2/26/2013	Analysis Date: 2/27/2013	SeqNo: 253781	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Petroleum Hydrocarbons, TR	100 20 100.0	7.440 96.2 80	120 2.50	20

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
 - R RPD outside accepted recovery limits

QC SUMMARY REPORT

WO#: 1302853

01-Mar-13

Client: Project:	Blagg Eng Howell #1	0									
Sample ID	MB-6265	SampTy	pe: MI	BLK	Test	Code: E	PA Method	8015B: Dies	el Range (Drganics	· · · · ·
Client ID:	PBS	Batch	ID: 62	65	R	lunNo: 8	3892				
Prep Date:	2/27/2013	Analysis Da	ate: 2	/28/2013	s	eqNo:	254079	Units: mg/M	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range (Organics (DRO)	ND	10						*		
Surr: DNOP	<u>.</u>	11		10.00		109	72.4	120			
Sample ID	LCS-6265	SampTy	pe: LC	s	Test	tCode: E	PA Method	8015B: Diese	el Range (Drganics	
Client ID:	LCSS	Batch	ID: 62	65	R	tunNo: 8	3892				
Prep Date:	2/27/2013	Analysis Da	ate: 2	/28/2013	S	eqNo: 2	254112	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range (Organics (DRO)	51	10	50.00	0	103	47.4	122			
Surr: DNOP		5.9		5.000		117	72.4	120			
Sample ID	1302844-003AMS	SampTy	pe: M	s	Test	Code: E	PA Method	8015B: Diese	el Range (Drganics	
Client ID:	BatchQC	Batch	ID: 62	65	R	tunNo: 8	3892				
Prep Date:	2/27/2013	Analysis Da	ate: 2	/28/2013	S	eqNo:	254355	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range (Organics (DRO)	56	10	51.23	0	109	12.6	148			
Surr: DNOP		5.6		5.123		109	72.4	120			
Sample ID	1302844-003AMSE	SampTy	pe: M	SD	Test	Code: E	PA Method	8015B: Diese	el Range C	Drganics	
Client ID:	BatchQC	Batch	ID: 62	65	R	unNo: (3892				
Prep Date:	2/27/2013	Analysis Da	ite: 2 /	/28/2013	s	eqNo: 2	254472	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range (Organics (DRO)	50	9.7	48.54	0	104	12.6	148	10.2	22.5	
Surr: DNOP		6.0		4.854		123	72.4	120	0	0	S

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
 - R RPD outside accepted recovery limits

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1302853

01-Mar-13

Client: Project:	Blagg En Howell #										
Sample ID	MB-6247	SampTy	pe: MI	3LK	Tes	tCode: El	PA Method	8015B: Gase	oline Rang	e	
Client ID:	PBS	Batch	ID: 62	47	F	RunNo: 8	875				
Prep Date:	2/26/2013	Analysis Da	ate: 2 /	27/2013	S	SeqNo: 2	53914	Units: mg/H	<g< td=""><td></td><td></td></g<>		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Rang Surr: BFB	e Organics (GRO)	ND 1100	5.0	1000		107	84	116			
Sample ID	LCS-6247	SampT	ype: LC	s	Tes	tCode: El	PA Method	8015B: Gase		e	
Client ID:	LCSS	Batch	ID: 62	47	F	RunNo: 8	875				
Prep Date:	2/26/2013	Analysis Da	ate: 2 /	27/2013	S	eqNo: 2	53915	Units: mg/k	٢g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Rang	e Organics (GRO)	29	5.0	25.00	0	115	62.6	136			
Surr: BFB		1200		1000		115	84	116			
Sample ID	1302842-001AMS	SampT	ype: M	S	Tes	tCode: El	PA Method	8015B: Gase	oline Rang	e	
Client ID:	BatchQC	Batch	ID: 62	47	F	RunNo: 8	875				
Prep Date:	2/26/2013	Analysis D	ate: 2,	27/2013	· s	eqNo: 2	53917	Units: mg/l	٢g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Rang	e Organics (GRO)	49	4.9	24.61	29.69	78.8	70	130			
Surr: BFB		2600		984.3		262	84	116			S
Sample ID	1302842-001AMSI) SampT	pe: MS	SD	Tes	tCode: El	PA Method	8015B: Gase	oline Rang	e	
Client ID:	BatchQC	Batch	ID: 62	47	F	lunNo: 8	875				
Prep Date:	2/26/2013	Analysis Da	ate: 2/	27/2013	S	eqNo: 2	53918	Units: mg/k	٢g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Rang	e Organics (GRO)	56	4.9	24.61	29.69	105	70	130	12.5	22.1	
Surr: BFB		2700		984.3		269	84	116	0	0	S

Qualifiers:

* Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

QC SUMMARY REPORT												
Hall Env	vironmental Analysis Laboratory, In	nc.										
Client:	Blagg Engineering											

Blagg Howel	Engineering 1#1A								
MB-6247	SampT	ype: ME	SLK	Tes	tCode: El	PA Method	8021B: Vola	tiles	
PBS	PBS Batch ID: 6247			F	RunNo: 8	875			
2/26/2013	26/2013 Analysis Date: 2/27/2013			5	SeqNo: 2	53934	Units: mg/Kg		
	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit
	ND	0.050							
	ND	0.050							

thylbenzene	ND	0.050								
ylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			
Sample ID LCS-6247	SampT	ype: LC	s	Tes	tCode: El	PA Method	8021B: Vola	tiles		
Client ID: LCSS	Batch	n ID: 624	47	F	RunNo: 8	875				
Prep Date: 2/26/2013	Analysis D)ate: 2/	27/2013	S	SeqNo: 2	53935	Units: mg/#	۲g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
enzene	0.92	0.050	1.000	0	92.3	80	120			
oluene	0.92	0.050	1.000	0	91.8	80	120			
thylbenzene	0.92	0.050	1.000	0	91.9	80	120			
ylenes, Total	2.8	0.10	3.000	0	92.9	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			
Sample ID 1302844-001AMS	SampT	ype: MS	3	Tes	tCode: El	PA Method	8021B: Vola	tiles		
Client ID: BatchQC	Batch	n ID: 62	47	F	RunNo: 8	875				
Prep Date: 2/26/2013	Analysis D	Date: 2/	27/2013	5	SeqNo: 2	53938	Units: mg/#	٢g		
Analyte							1.12 1.1.1.1.1.14		0001:	- ·
	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
enzene	Result 1.0	PQL 0.049	SPK value 0.9852	SPK Ref Val 0	%REC 107	LowLimit 67.2	HighLimit 113	%RPD		Qual
······································										Qual

Sample ID 1302844-001AM	I SD Samp1	ype: MS	SD	TestCode: EPA Method 8021B: Volatiles							
Client ID: BatchQC	47	F	RunNo: 8	875							
Prep Date: 2/26/2013	Analysis D)ate: 2/	27/2013	S	SeqNo: 2	53939	Units: mg/M	(g			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	1.0	0.047	0.9390	0	111	67.2	113	0.725	14.3		
Toluene	1.1	0.047	0.9390	0.004008	112	62.1	116	0.489	15.9		
Ethylbenzene	1.1	0.047	0.9390	0.01148	115	67.9	127	2.21	14.4		
Xylenes, Total	3.3	0.094	2.817	0.09455	113	60.6	134	1.77	12.6		
Surr: 4-Bromofluorobenzene	1.1		0.9390		114	80	120	0	0		

0.09455

106

117

60.6

80

134

120

0.099

2.956

0.9852

3.2

1.2

Qualifiers:

J

Xylenes, Total

Surr: 4-Bromofluorobenzene

.

.

Project:

Benzene Toluene

Sample ID Client ID: Prep Date: Analyte

* Value exceeds Maximum Contaminant Level.

E Value above quantitation range

Analyte detected below quantitation limits

P Sample pH greater than 2

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

WO#: 1302853

Qual

01-Mar-13

ENVIRONMENTAL ANALYSIS LABORATORY TEL: 505-34	Amental Analysis Laboratory 4901 Hawkins NE Albuguergue, NM 87103 45-3975 FAX: 505-345-410; www.hallenvironmental.com
Client Name: BLAGG	Work Order Number: 1302853
Received by/date:	
Logged By: Ashley Gallegos 2/26/2013 10:00	·
Completed By: Ashley Gallegos 2/26/2013 12:02	2:52 PM 5
Reviewed By: AT 02/26/13	
Chain of Custody	
1. Were seals intact?	Yes 🔲 No 🗌 Not Present 🗹
2. Is Chain of Custody complete?	Yes 🗹 No 🗔 Not Present 🗔
3. How was the sample delivered?	Courier
Log in	
 Coolers are present? (see 19. for cooler specific information)) Yes 🗹 No 🗌 NA 🗌
5. Was an attempt made to cool the samples?	Yes 🗹 No 🗌 🛛 NA 🗌
6. Were all samples received at a temperature of >0° C to 6.0°	°C Yes 🗹 No 🗌 NA 🗌
7 Sample(s) in proper container(s)?	Yes 🗹 No 🗔
8. Sufficient sample volume for indicated test(s)?	Yes 🗹 No 🗌
${f g}_{.}$ Are samples (except VOA and ONG) properly preserved?	Yes 🗹 No 🗌
10. Was preservative added to bottles?	Yes 🗌 No 🗹 🛛 NA 🗌
11, VOA vials have zero headspace?	Yes 🗌 No 🗌 No VOA Vials 🗹
12. Were any sample containers received broken?	Yes 🗆 No 🗹
 Does paperwork match bottle labels? (Note discrepancies on chain of custody) 	Yes V No H # of preserved bottles checked for pH:
14. Are matrices correctly identified on Chain of Custody?	Yes ✓ No □ (<2 or >12 unless noted)
15. Is it clear what analyses were requested?	Yes 🗹 No 🗌 Adjusted?
16. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes 🗹 No 🗌 Checked by:
Special Handling (if applicable)	
17. Was client notified of all discrepancies with this order?	Yes 🗌 No 🗋 🛛 NA 🗹
Person Notified:	Date:
By Whom:	via: 🗌 eMail 🛄 Phone 🛄 Fax 🛄 In Person
Regarding:	·
Client Instructions:	
18. Additional remarks:	

19. Cooler Information

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Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.9	Good	Not Present			



BP America Production Company 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

November 12, 2012

DD

Bureau of Land Management Mark Kelly 1235 La Plata Hwy Farmington, NM 87401

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank Well Name: HOWELL 001A

Dear Mr. Kelly,

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 25, 2012. If there aren't any unforeseen problems, 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.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at 505-326-9214

Sincerely,

9DUL

Jerry Van Riper Surface Land Negotiator BP America Production Company

BP America Production Company 200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

SENT VIA E-MAIL TO: BRANDON.POWELL@STATE.NM.US

November 14, 2012

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

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

HOWELL 001A API 30-045-22248 (M) Section 20 – T30N – R08W San Juan County, New Mexico

Dear Mr. Brandon Powell:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 21 bbl. BGT that will no longer be operational at this well site.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Buddy Shaw BP Environmental Advisor

(505) 320-0401

-990 BP AMERICA PRODUCTION COMPANY 御田 きょうちょう HOWELL OOTA API 3004522248 LEASE NMSF078578 1850 FSL 1105 FEL (I) SEC 20 T30N R8W San Juan County ELEV 5749 LAT 36° 47' 38,868" LONG 107°41" 38.832" **BGT** marker