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

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 Fc 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   |      |
|--|------|
| $\sqrt{\mathcal{O}}^{12}$ Proposed Alternative Method Permit or Closure Plan Application   |      |
| Type of action:<br>Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method<br>Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method<br>Modification to an existing permit<br>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 ordinance of the environment.                          | ces. |
| 1.   |      |
| Operator: BP AMERICA PRODUCTION COMPANY OGRID #:778  |      |
| Address: 200 Energy Court, Farmington, NM 87401  | _    |
| Facility or well name: LENIS A SHANE USA 001   | _    |
| API Number:         3004520205         OCD Permit Number:           U/L or Qtr/Qtr         N         Section         14.0         Township         29.0N         Range         09W         County:         San Juan County   |      |
| U/L or Qtr/Qtr N Section 14.0 Township 29.0N Range 09W County: San Juan County   |      |
| Center of Proposed Design: Latitude 36.72007 Longitude -107.75146 NAD: 1927 🛙 1983   |      |
| Surface Owner: 🗷 Federal 🗌 State 🗌 Private 🗌 Tribal Trust or Indian Allotment  |      |
| 2. OIL CONS. DIV DIST. 3   |      |
| $\square \underline{Pit}: Subsection For G of 19.15.17.11 NMAC$  |      |
| Temporary: Drilling Workover MAY 14 2014   |      |
| Permanent Emergency Cavitation P&A   |      |
|  |      |
| Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other   |      |
| Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other   |      |
| String-Reinforced  |      |
|  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: Lx Wx D  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: Lx Wx D         3.   |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: Lx Wx D         3.       Closed-loop System:       Subsection H of 19.15.17.11 NMAC         Type of Operation:       P&A       Drilling a new well       Workover or Drilling (Applies to activities which require prior approval of a permit or notice of         |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: Lx Wx D         3.       Closed-loop System:       Subsection H of 19.15.17.11 NMAC         Type of Operation:       P&A       Drilling a new well       Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent) |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: L x W x D         3.   |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: Lx Wx D         3.         3.  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: L  |      |
| String-Reinforced   Liner Seams:   Welded   Factory   Other   Volume:   bbl   Dimensions:   Liner Seams:   Welded   Factory   Other   Volume:   Volume:   bbl   Dimensions:   Liner Seams:   Welded   Factory   Other   Liner Seams:   Welded   Factory   Other  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:       bbl       Dimensions: L  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other  |      |
| String-Reinforced         Liner Seams:       Welded       Factory       Other       Volume:  |      |

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\_

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<u>Netting</u>: 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)

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

| Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acce<br>material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appro<br>office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a<br>Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry<br>above-grade tanks associated with a closed-loop system. | opriate district<br>approval. |
|--|-------------------------------|
| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | 🗋 Yes 🗌 No                    |
| <ul> <li>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).</li> <li>Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | Yes No                        |
| <ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>(Applies to temporary, emergency, or cavitation pits and below-grade tanks)</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>  | Yes No                        |
| <ul> <li>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits)</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>  | ☐ Yes ☐ No<br>☐ NA            |
| <ul> <li>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.</li> <li>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>   | Yes 🗌 No                      |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance<br>adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>Written confirmation or verification from the municipality; Written approval obtained from the municipality   | 🔲 Yes 🗌 No                    |
| Within 500 feet of a wetland.<br>- 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.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division  | 🗌 Yes 🗌 No                    |
| <ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>  | Yes No                        |
| Within a 100-year floodplain.  | 🗌 Yes 🗌 No                    |

FEMA map

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| 1   | 11. <u>Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist</u> : 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.         Image: Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC   |
|     | <ul> <li>Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> </ul>   |
|     | <ul> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC</li> <li>and 19.15.17.13 NMAC</li> </ul>  |
|     | Previously Approved Design (attach copy of design) AP! Number: or Permit Number:  |
|     | <ul> <li>12.<br/><u>Closed-loop Systems Permit Application Attachment Checklist</u>: Subsection B of 19.15.17.9 NMAC<br/><i>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.</i> <ul> <li>Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9</li> <li>Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> </ul> </li> </ul> |
|     | Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC<br>and 19.15.17.13 NMAC  |
|     | Previously Approved Design (attach copy of design) API Number:  |
|     | Previously Approved Operating and Maintenance Plan     API Number:  |
| Ĺ   | above ground steel tanks or haul-off bins and propose to implement waste removal for closure)   |
|     | <ul> <li>Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC</li> <li>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.</li> <li>Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC</li> </ul>  |
|     | <ul> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Climatological Factors Assessment</li> <li>Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> </ul>   |
|     | <ul> <li>Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Quality Control/Quality Assurance Construction and Installation Plan</li> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> </ul>  |
|     | <ul> <li>Operating and Maintenance France based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan</li> <li>Emergency Response Plan</li> </ul>  |
|     | <ul> <li>Oil Field Waste Stream Characterization</li> <li>Monitoring and Inspection Plan</li> </ul>   |
|     | Erosion Control Plan  |
| L   | Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC  |
|     | <sup>14.</sup> <u>Proposed Closure</u> : 19.15.17.13 NMAC<br>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  |
|     | Proposed Closure Method: X Waste Excavation and Removal<br>Waste Removal (Closed-loop systems only)   |
|     | <ul> <li>On-site Closure Method (Only for temporary pits and closed-loop systems)</li> <li>In-place Burial</li> <li>On-site Trench Burial</li> </ul>  |
|     | Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)  |
|     | <ul> <li>15.</li> <li>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.</li> <li>Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC</li> </ul>  |
|     | <ul> <li>Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC</li> <li>Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)</li> <li>Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> <li>Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC</li> </ul>   |
|     | Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC   |

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| Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13. Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if 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 <i>will not</i> be used for future ser<br>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  | С                      |
| 17.<br><u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC<br><i>Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sou</i><br><i>provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate dis</i><br><i>considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just</i><br><i>demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.</i>  | trict office or may be |
| Ground water is less than 50 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | □ Yes □ No<br>□ NA     |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | □ Yes □ No<br>□ NA     |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | □ Yes □ No<br>□ 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).<br>- 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.<br>- 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.<br>- 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<br>adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality  | 🗌 Yes 🗌 No             |
| Within 500 feet of a wetland.<br>- 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.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division   | 🗌 Yes 🗌 No             |
| <ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological<br/>Society; Topographic map</li> </ul>   | 🗌 Yes 🗌 No             |
| Within a 100-year floodplain.<br>- FEMA map   | Yes No                 |
| <ul> <li>18.</li> <li>On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure play a check mark in the box, that the documents are attached.</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Proof of Surface Owner Notice - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC</li> <li>Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards canned Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> </ul> | 15.17.11 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

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| Operator Application Certification:<br>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 Peace  | Title: Field Environmental Advisor   |
| loop 21  |  |
| Signature: Hilling M. Jesse  | Date: 06/14/2010   |
| e-mail address: Peaceweifrey@ep.com  | Telephone: _505-326-9479   |
| 20.  |  |
| OCD Approval: Permit Application (including closure plan)  | psure Plan (only) OCD (Conditions (see attachment)   |
| OCD Representative Signature   |  |
| Title: Environmental Etgineer  | OCD Permit Number:   |
| J  |  |
| 21.<br><u>Closure Report (required within 60 days of closure completion)</u> : Subs  |  |
| Instructions: Operators are required to obtain an approved closure plan  | prior to implementing any closure activities and submitting the closure  |
| The closure report is required to be submitted to the division within 60 da<br>section of the form until an approved closure plan has been obtained and  |  |
|  | Closure Completion Date: 7-13-2011   |
| 22.  |  |
| <u>Closure_Method</u> :  |  |
| Waste Excavation and Removal On-Site Closure Method I 4<br>If different from approved plan, please explain.  | Alternative Closure Method 🔲 Waste Removal (Closed-loop systems o  |
|  |  |
| 23.<br>Closure Report Regarding Waste Removal Closure For Closed-loop Sy   | vstems That Iltilize Above Ground Steel Tanks or Haul-off Bigs Only  |
| Instructions: Please indentify the facility or facilities for where the liquid   |  |
| two facilities were utilized.  |  |
| Disposal Facility Name:  | Disposal Facility Permit Number:   |
|  |  |
| Disposal Facility Name:  | Disposal Facility Permit Number:   |
| Disposal Facility Name:<br>Were the closed-loop system operations and associated activities performed<br>Yes (If yes, please demonstrate compliance to the items below)  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?   |
| Were the closed-loop system operations and associated activities performed<br>Yes (If yes, please demonstrate compliance to the items below)   | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No   |
| Were the closed-loop system operations and associated activities performed<br>Yes (If yes, please demonstrate compliance to the items below)<br>Required for impacted areas which will not be used for future service and a<br>Site Reclamation (Photo Documentation)  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No   |
| Were the closed-loop system operations and associated activities performed<br>Yes (If yes, please demonstrate compliance to the items below)   | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No   |
| Were the closed-loop system operations and associated activities performed Yes (If yes, please demonstrate compliance to the items below)  Required for impacted areas which will not be used for future service and e Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i>   |
| Were the closed-loop system operations and associated activities performed<br>Yes (If yes, please demonstrate compliance to the items below)<br><i>Required for impacted areas which will not be used for future service and a</i><br>Site Reclamation (Photo Documentation)<br>Soil Backfilling and Cover Installation<br>Re-vegetation Application Rates and Seeding Technique<br>24.<br><u>Closure Report Attachment Checklist</u> : <i>Instructions: Each of the follow</i>  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i>   |
| Were the closed-loop system operations and associated activities performed         Yes (If yes, please demonstrate compliance to the items below)         Required for impacted areas which will not be used for future service and or         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 follow mark in the box, that the documents are attached.         Proof of Closure Notice (surface owner and division)   | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i>   |
| Were the closed-loop system operations and associated activities performed         Yes (If yes, please demonstrate compliance to the items below)         Required for impacted areas which will not be used for future service and or         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 follow 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)   | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i>   |
| Were the closed-loop system operations and associated activities performed         Yes (If yes, please demonstrate compliance to the items below)         Required for impacted areas which will not be used for future service and o         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 follow 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)  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i>   |
| Were the closed-loop system operations and associated activities performed         Yes (If yes, please demonstrate compliance to the items below)         Required for impacted areas which will not be used for future service and of         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 follow 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)         Xent Confirmation Sampling Analytical Results (if applicable)         Waste Material Sampling Analytical Results (required for on-site closure)   | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i><br>wing items must be attached to the closure report. Please indicate, by a c   |
| Were the closed-loop system operations and associated activities performed         Yes (If yes, please demonstrate compliance to the items below)         Required for impacted areas which will not be used for future service and of         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 follow 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)         Xempling Analytical Results (if applicable)         Waste Material Sampling Analytical Results (required for on-site closure)         Disposal Facility Name and Permit Number  | Disposal Facility Permit Number:<br>d on or in areas that <i>will not</i> be used for future service and operations?<br>No<br><i>operations:</i><br>wing items must be attached to the closure report. Please indicate, by a c   |
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## BP AMERICA PRODUCTION COMPANY SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### BELOW-GRADE TANK CLOSURE PLAN

#### <u>Lenis A. Shane USA 1</u> <u>API No. 3004520205</u> <u>Unit Letter N, Section 14, T29N, R9W</u>

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**

- 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. 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. 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:
  - 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.

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                      | Release Verification | Sample  |
|--------------|-------------------------------------|----------------------|---------|
|              | 21 bbl BGT                          | (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      |
| 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 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.

State of New Mexico Energy Minerals and Natural Resources

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

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

| 1220 S. St. Francis Dr., Santa Fe, NM 87505 Santa   | Fe, NM 87505   |   |  |                                  |                                  |  |  |  |  |  |
|---|--|---|--|----------------------------------|----------------------------------|--|--|--|--|--|
| Release Notification  | on and Corrective Acti   | on  |  |                                  |                                  |  |  |  |  |  |
|   | OPERATOR   | 🗌 Initia  | l Report   | $\boxtimes$                      | Final Report                     |  |  |  |  |  |
| Name of Company: BP   | Contact: Jeff Peace  |   |  |                                  |                                  |  |  |  |  |  |
| Address: 200 Energy Court, Farmington, NM 87401   | Telephone No.: 505-326-9479  |   |  |                                  |                                  |  |  |  |  |  |
| Facility Name: Lenis A Shane USA 1  | Facility Type: Natural gas well  |   |  |                                  |                                  |  |  |  |  |  |
| Surface Owner: Federal Mineral Owner  | r: Federal   | API No.   | . 30045202   | 205                              |                                  |  |  |  |  |  |
| LOCATI  | ON OF RELEASE  |   |  |                                  |                                  |  |  |  |  |  |
|   | th/South Line Feet from the East   | st/West Line<br>est                                       | County: Sa   | in Juan                          |                                  |  |  |  |  |  |
| Latitude36.72007  | Longitude 107.75146  |   |  |                                  |                                  |  |  |  |  |  |
|   | E OF RELEASE   |   |  |                                  |                                  |  |  |  |  |  |
| Type of Release: none   | Volume of Release: N/A   | Volume R  | ecovered: N  |                                  | ······                           |  |  |  |  |  |
| Source of Release: below grade tank – 21 bbl  | Date and Hour of Occurrence:   |   | -lour of Disc  |                                  |                                  |  |  |  |  |  |
| Was Immediate Notice Given?   | If YES, To Whom?   |   |  |                                  |                                  |  |  |  |  |  |
|   |  |   |  |                                  |                                  |  |  |  |  |  |
| By Whom?<br>Was a Watercourse Reached?  | Date and Hour<br>If YES, Volume Impacting the W  | latercourse   |  |                                  |                                  |  |  |  |  |  |
| Yes X No  | IT TES, Volume impacting the w   | valereourse,  |  |                                  |                                  |  |  |  |  |  |
| If a Watercourse was Impacted, Describe Fully.*   |  |   | ·····-   |                                  |                                  |  |  |  |  |  |
|   |  |   |  |                                  |                                  |  |  |  |  |  |
| Describe Cause of Problem and Remedial Action Taken.* Sampling of<br>the BGT. Soil analysis resulted in TPH, BTEX and chloride below star<br>Describe Area Affected and Cleanup Action Taken.* BGT was removed<br>backfilled and compacted and is still within the active well area.  | ndards. Analysis results are attached.   |   |  |                                  |                                  |  |  |  |  |  |
| I hereby certify that the information given above is true and complete to regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by should their operations have failed to adequately investigate and remedi or the environment. In addition, NMOCD acceptance of a C-141 report federal, state, or local laws and/or regulations. | notifications and perform corrective a<br>the NMOCD marked as "Final Report<br>ate contamination that pose a threat to | actions for relea<br>t" does not relie<br>o ground water, | ases which the operative the operation of the operation o | may end<br>ator of l<br>ter, hum | langer<br>iability<br>aan health |  |  |  |  |  |
|   | OIL CONSER   | <b>RVATION</b>  | DIVISIO  | N                                |                                  |  |  |  |  |  |
| Signature: Signature: Signature   |  |   |  |                                  |                                  |  |  |  |  |  |
| Printed Name: Jeff Peace  | Approved by Environmental Specia   | list:   |  |                                  |                                  |  |  |  |  |  |
|   | Approval Date:   | Evpiration P  |  |                                  |                                  |  |  |  |  |  |
| Title: Area Envíronmental Advisor   |  | Expiration D  |  |                                  |                                  |  |  |  |  |  |
| E-mail Address: peace.jeffrey@bp.com  | Conditions of Approval:  |   | Attached   |                                  |                                  |  |  |  |  |  |
| Date: May 13, 2014 Phone: 505-326-9479  |  |   |  |                                  |                                  |  |  |  |  |  |

\* Attach Additional Sheets If Necessary

| ,<br>   |   | the second s |
|---|---|--|
|   | BLAGG ENGINEERING, INC.   | API#   |
| CLIENT: DF  | P.O. BOX 87, BLOOMFIELD, NM 87413   |  |
|   | (505) 632-1199  | (if applicble): <b>A</b>   |
| FIELD REPORT:   | (circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:   | PAGE #: <u>1</u> of <u>1</u>   |
| SITE INFORMATION  | SITE NAME: LENIS A SHANE USA # 1  | DATE STARTED: 06/24/11   |
| QUAD/UNIT: N SEC: 14 TWP:   | 29N RNG: 9W PM: NM CNTY: SJ ST: NM  | DATE FINISHED:   |
| 1/4 -1/4/FOOTAGE: 790'S / 1,675   | W SE/SW LEASE TYPE: FEDERAL STATE / FEE / INDIAN  | ENVIRONMENTAL  |
| LEASE #: SF077184   | PROD. FORMATION: PC CONTRACTOR: MBF - C. McIness  | SPECIALIST(S): NJV   |
| REFERENCE POINT   | WELL HEAD (W.H.) GPS COORD.: 36.72009 X 107.751   | 86 GL ELEV.: 5.911'  |
|   | GPS COORD.: 36.72007 X 107.75146 DISTANCE/BE  |  |
| 2)  |   |  |
| 3)  | GPS COORD.: DISTANCE/BE   | ARING FROM W.H.:   |
| 4)  | GPS COORD.: DISTANCE/BE   | ARING FROM W.H.:   |
| LAB INFORMATION:  | CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL  | OVM<br>READING   |
| 1) SAMPLE ID: 5 PC-TB @ 6' (21  | BGT) SAMPLE DATE: 06/24/11 SAMPLE TIME: 1015 LAB ANALYSIS: 418.1/   | 8015B/8021B/300.0 (CI) NA  |
| 2) SAMPLE ID:   | SAMPLE DATE:  |  |
| 3) SAMPLE ID:   | SAMPLE DATE:  |  |
| 4) SAMPLE ID:   | SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:   |  |
| SOIL DESCRIPTION  | SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / GRAVEL / OT  | HER  |
| SOIL COLOR: MODERATE  |   |  |
| COHESION (ALL OTHERS): NON COHESIVE/ SLIGHTLY                                     |   | COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC   |
| CONSISTENCY (NON COHESIVE SOILS): LC<br>MOISTURE: DRY SLIGHTLY MOIST / MOIST / WE |   |  |
| SAMPLE TYPE: GRAB (COMPOSITE) #   |   | ANATION  |
| DISCOLORATION/STAINING OBSERVED:  | YES NO EXPLANATION -  |  |
| ANY AREAS DISPLAYING WETNESS: YES / NO  |   |  |
|   | E EQUIPMENT SHARED WITH SHANE GC #1A. NO EVIDENCE OF AN APPAREN   | IT RELEASE FROM BGT.   |
|   |   |  |
| EXCAVATION DIMENSIONS (if applicable)   | : NA ft. X NA ft. X NA ft. cubic yards ex   | cavated (if applicable):   |
| ,   |   | CD TPH CLOSURE STD: PPM  |
| SITE SKETCH   | PLOT PLAN circle: attached  | CALIB. READ. = NA ppm PE - 0.52  |
|   |   | CALIB. RCAU. = $\frac{\mathbf{NA}}{\mathbf{NA}}$ ppm $\frac{\mathbf{RF} = 0.52}{\mathbf{NA}}$                  |
| WELL $\oplus$<br>HEAD   |   | <b>NA</b> am/pm DATE: <b>NA</b>  |
| HEAD  | FENCE   | MISCELL. NOTES   |
| WOODEN  | 300 BBL<br>PROD. TANK   |  |
| R.W. —  |   | NO: N1373617   |
|   | SHANE CO HA   | NO: 48699  |
| AUTOMATION  | WOODEN WELL HEAD  | PAYKEY: ZSCHWLLBGT   |
|   |   |  |
| S.P.D.  | 21 BGT<br>PBGTL –   |  |
| 0.1.D.  | T.B. ~ 6'<br>B.G.   |  |
| ZOOM IN PROFILE   | STEEP DOWN SLOPE &  |  |
| OF 21 BGT<br>NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCA                           | ✓ SURFACE GRADIENT DIRECTION VATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; | BGT SIDEWALLS VISIBLE () N / NA  |
| T.B. = TANK BOTTOM; PBGTL = PREVIOUS  | BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL;                             | Agnetic declination: 10° E   |
| NA-NOT APPLICABLE OR NOT AVAILABLE<br>TRAVEL NOTES: CALLOUT:                      | E; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.                                | Sched.)  |
| CALLOUT:  | ONGILE. VOIZTILE MORNING  |  |

| CLIENT:         | Blagg Engineering     |         |          | Client | Sample ID:    | 5PC TB 6  | (21 BGT)             |
|-----------------|-----------------------|---------|----------|--------|---------------|-----------|----------------------|
| Lab Order:      | 1106B73               |         |          | Coll   | ection Date:  | 6/24/2011 | 10:15:00 AM          |
| Project:        | Lenis A Shane USA 1   |         |          | Da     | te Received:  | 6/29/2011 |                      |
| Lab ID:         | 1106B73-01            |         |          |        | Matrix:       | SOIL      |                      |
| Analyses        |                       | Result  | PQL      | Qual   | Units         | DF        | Date Analyzed        |
| EPA METHOD      | 8015B: DIESEL RANGE O | RGANICS |          |        | <u> </u>      |           | Analyst: JB          |
| Diesel Range O  | rganics (DRO)         | ND      | 10       | I      | mg/Kg         | 1         | 7/1/2011 9:58:48 PM  |
| Surr: DNOP      |                       | 94.2    | 73.4-123 |        | %REC          | 1         | 7/1/2011 9:58:48 PM  |
| EPA METHOD      | 8015B: GASOLINE RANG  | E       |          |        |               |           | Analyst: RAA         |
| Gasoline Range  | Organics (GRO)        | ND      | 4.6      | ı      | n <b>g/Kg</b> | 1         | 7/5/2011 5:56:19 PM  |
| Surr: BFB       |                       | 114     | 75.2-136 | ç      | %REC          | 1         | 7/5/2011 5:56:19 PM  |
| EPA METHOD      | 8021B: VOLATILES      |         |          |        |               |           | Analyst: RAA         |
| Benzene         |                       | ND      | 0.046    | r      | ng/Kg         | 1         | 7/5/2011 5:56:19 PM  |
| Toluene         |                       | ND      | 0.046    | r      | ng/Kg         | 1         | 7/5/2011 5:56:19 PM  |
| Ethylbenzene    |                       | ND      | 0.046    | r      | ng/Kg         | 1         | 7/5/2011 5:56:19 PM  |
| Xylenes, Total  |                       | ND      | 0.092    | r      | ng/Kg         | 1         | 7/5/2011 5:56:19 PM  |
| Surr: 4-Bromo   | ofluorobenzene        | 106     | 92-130   | q      | %REC          | 1         | 7/5/2011 5:56:19 PM  |
| EPA METHOD 3    | 300.0: ANIONS         |         |          |        |               |           | Analyst: SRM         |
| Chloride        |                       | ND      | 1.5      | г      | ng/Kg         | 1         | 7/12/2011 1:33:18 PM |
| EPA METHOD 4    | 118.1: TPH            |         |          |        |               |           | Analyst: <b>JB</b>   |
| Petroleum Hydro | ocarbons, TR          | ND      | 20       | n      | ng/ <b>Kg</b> | 1         | 6/30/2011            |

Hall Environmental Analysis Laboratory, Inc.

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Qualifiers:

\* Value exceeds Maximum Contaminant Level

E Estimated value

J Analyte detected below quantitation limits

NC Non-Chlorinated

PQL Practical Quantitation Limit

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

MCL Maximum Contaminant Level

- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

| CLIENT:        | Blagg Engineering     |         |          | Clien | t Sample ID:  | 1@3' Flo  | w line Release       |
|----------------|-----------------------|---------|----------|-------|---------------|-----------|----------------------|
| Lab Order:     | 1106B73               |         |          | Col   | lection Date: | 6/27/2011 | 4:20:00 PM           |
| Project:       | Lenis A Shane USA 1   |         |          | Da    | ate Received: | 6/29/2011 | 1                    |
| Lab ID:        | 1106B73-02            |         |          |       | Matrix:       | SOIL      |                      |
| Analyses       |                       | Result  | PQL      | Qual  | Units         | DF        | Date Analyzed        |
| EPA METHOD     | 8015B: DIESEL RANGE O | RGANICS |          |       |               |           | Analyst: JB          |
| Diesel Range O | rganics (DRO)         | ND      | 10       |       | mg/Kg         | 1         | 7/1/2011 11:07:37 PM |
| Surr: DNOP     |                       | 99.1    | 73.4-123 |       | %REC          | 1         | 7/1/2011 11:07:37 PM |
| EPA METHOD     | 8015B: GASOLINE RANG  | E       |          |       |               |           | Analyst: RAA         |
| Gasoline Range | Organics (GRO)        | ND      | 4.7      |       | mg/Kg         | 1         | 7/5/2011 6:25:18 PM  |
| Surr: BFB      |                       | 115     | 75.2-136 |       | %REC          | 1         | 7/5/2011 6:25:18 PM  |
| EPA METHOD     | 8021B: VOLATILES      |         |          |       |               |           | Analyst: RAA         |
| Benzene        |                       | ND      | 0.047    |       | mg/Kg         | 1         | 7/5/2011 6:25:18 PM  |
| Toluene        |                       | ND      | 0.047    |       | mg/Kg         | 1         | 7/5/2011 6:25:18 PM  |
| Ethylbenzene   |                       | ND      | 0.047    |       | mg/Kg         | 1         | 7/5/2011 6:25:18 PM  |
| Xylenes, Total |                       | ND      | 0.094    |       | mg/Kg         | 1         | 7/5/2011 6:25:18 PM  |
| Surr: 4-Bromo  | ofluorobenzene        | 107     | 92-130   |       | %REC          | 1         | 7/5/2011 6:25:18 PM  |
| EPA METHOD :   | 300.0: ANIONS         |         |          |       |               |           | Analyst: SRM         |
| Chloride       |                       | ND      | 7.5      |       | mg/Kg         | 5         | 7/12/2011 2:08:07 PM |

### Hall Environmental Analysis Laboratory, Inc.

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

| CI            | hain-o  | of-Cus        | stody Record                             | Tum-Around T            | ïme:                   |                                 |                        |                              |                               | <u>ا</u>           |                    |                   | -             | a Bra                    | re                           | പ           | 81 B            | æ                | Nĩ          | "AI         | 3               |                      |
|---------------|---------|---------------|--|-------------------------|------------------------|---------------------------------|------------------------|------------------------------|-------------------------------|--------------------|--------------------|-------------------|---------------|--------------------------|------------------------------|-------------|-----------------|------------------|-------------|-------------|-----------------|----------------------|
| Client:       |         |               |  | Standard                | 🗌 Rush                 |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  | IN H        |             |                 |                      |
|               |         |               |  | Project Name:           |                        |                                 |                        |                              |                               |                    |                    | w.ha              |               |                          |                              |             |                 |                  |             | <b>-</b> 13 | ⊾ ■             |                      |
| Mailing A     | ddress: | P.O. BO       | K 87                                     | LENI                    | S A SHANE U            | JSA #1                          |                        | 49                           | 01 H                          |                    |                    |                   |               |                          | -                            |             |                 | 7109             | •           |             |                 |                      |
|               |         | BLOOM         | FIELD, NM 87413                          | Project #:              |                        | <sup></sup>                     |                        |                              | I. 50                         |                    |                    |                   |               |                          |                              | 345-        |                 |                  |             |             |                 |                      |
| Phone #:      |         | (505) 63      | 2-1199                                   |                         |                        |                                 | 5                      | . *                          |                               | arta               |                    | ۸                 |               |                          |                              | ues         |                 | ాకా              |             |             | a la<br>I       |                      |
| email or      | Fax#:   |               |  | Project Manag           | jer:                   |                                 |                        |                              |                               |                    |                    |                   | -             | S04)                     |                              |             |                 |                  |             |             |                 | <u></u>              |
| QAVQC Pa      | -       |               | Level 4 (Full Validation)                |                         | NELSON VE              | LEZ                             | <del>B's</del> (8021B) | only)                        | /Diesel)                      |                    |                    |                   |               | P04,                     | CB's                         |             |                 |                  |             |             | a               |                      |
| Accredita     |         | Other         |  | Sampler:<br>On Ice:     | NELSON VE              | ELEZ 927                        | <del>мВ'-</del> (8     | PH (Gas                      | 5B (Gas                       | 3.1)               | 1.1)               | (f                |               | 3, NO2,                  | 8082 Pi                      |             |                 | -                |             |             | sample          | (z                   |
| D EDD (       |         |               |  | Sample Temp             |                        | 310                             |                        | + 1                          | 801                           | d 418              | d 50/              | r PA              | sle           | Ň                        | des /                        |             | (AO)            | 0.0              |             | a           | osite           | ۲ or                 |
| Date          | Time    | Matrix        | Sample Request ID                        | Container<br>Type and # | Preservative<br>Type   | HEAL No.                        | BTEX + <del>MTDE</del> | BTEX + MTBE + TPH (Gas only) | TPH Method 8015B (Gas/Diesel) | TPH (Method 418.1) | EDB (Method 504.1) | 8310 (PNA or PAH) | RCRA 8 Metals | Anions (F, Cl, NO3, NO2, | 8081 Pesticides / 8082 PCB's | 8260B (VOA) | 8270 (Semi-VOA) | Chloride (300.0) |             | Grab sample | 5 pt. composite | Air Bubbles (Y or N) |
| 6/24/11       | 1015    | SOIL          | 5PC-TB @ 6' (21 BGT)                     | 4 oz 1                  | Cool                   | 1106873-1                       | V                      |                              | ۷                             | ۷                  |                    |                   |               |                          |                              |             |                 | V                |             | -           | V               |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             | 1           |                 |                      |
| 6/27/11       | 1620    | SOIL          | 1@3'-FLOW LINE RELEASE                   | 4 oz 1                  | Cool                   | _2_                             | ۷                      |                              | ۷                             |                    |                    |                   |               |                          |                              |             |                 | V                |             | V           | -1              |                      |
| <u> </u>      |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
|               |         |               |  |                         |                        |                                 |                        |                              |                               |                    |                    |                   |               |                          |                              |             |                 |                  |             |             |                 |                      |
| Date:         | Time:   | Relinquish    | ed by:                                   | Received by:            |                        | Date Time                       | Rer                    | nark                         |                               |                    | -                  |                   | -             | GRC                      | ) &                          | DRC         |                 | NLY.             |             |             |                 |                      |
| 728/N         | 1210    |               | Mr J                                     | Mestre                  | Weeters                | 6/28/11 1210                    |                        |                              | L <b>L DI</b><br>T Pea        |                    |                    |                   |               | rt. Fa                   | armir                        | ngton       | . NM            | 1 8740           | 01          |             |                 |                      |
| Date:         | Time:   | Relinquish    | atta Walter                              | Received by:            | Hand                   | Date', Time<br>115 (117911(810) |                        |                              | ork C                         |                    |                    |                   |               |                          |                              |             |                 |                  | <u>HWLI</u> | <u>_BGT</u> |                 |                      |
| <del>,,</del> |         | ary samples s | submitted to Hall Environmental/may be s | abcontracted to other   | accredited laboratorie | s. This serves as notice c      | of this p              | possib                       | ilīty. A                      | ny sul             | b-cont             | racted            | data          | will be                  | dear                         | ly nota     | ited or         | the ai           | nalytica    | ai repo     | ərt.            |                      |

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# **QA/QC SUMMARY REPORT**

| Client:Blagg EnginProject:Lenis A Sha                     | -            |               |     |            |       |                  |               |                 | Work    | Order:      | 1106B73     |
|---|--------------|---------------|-----|------------|-------|------------------|---------------|-----------------|---------|-------------|-------------|
| Analyte   | Result       | Units         | PQL | SPK Va SPi | K ref | %Rec L           | .owLimit H    | ighLimit        | %RPD    | RPDLimi     | t Qual      |
| Method: EPA Method 300.0: A                               | nions        |               |     |            |       |                  |               |                 |         |             |             |
| Sample ID: MB-27558                                       |              | MBLK          |     |            |       | Batch ID:        | 27558         | Analysi         | s Date: | 7/12/2011   | 10:39:09 AM |
| Chloride  | ND           | mg/Kg         | 1.5 |            |       |                  |               |                 |         |             |             |
| Sample ID: LCS-27558                                      |              | LCS           |     |            |       | Batch ID:        | 27558         | Analysi         | s Date: | 7/12/2011   | 10:56:34 AN |
| Chloride  | 14.53        | mg/Kg         | 1.5 | 15         | 0     | 96.9             | 90            | 110             |         |             |             |
| Method: EPA Method 418.1: T<br>Sample ID: MB-27432        | РН           | MBLK          |     |            |       | Batch ID:        | 27432         | Analysi         | s Date: |             | 6/30/2011   |
| Petroleum Hydrocarbons, TR<br>Sample ID: LCS-27432        | ND           | mg/Kg<br>LCS  | 20  |            |       | Batch ID:        | 27432         | Analysi         | s Date: |             | 6/30/2011   |
| Petroleum Hydrocarbons, TR<br>Sample ID: LCSD-27432       | 105.8        | mg/Kg<br>LCSD | 20  | 100        | 0     | 106<br>Batch ID: | 81.4<br>27432 | 118<br>Analysi  | s Date: |             | 6/30/2011   |
| Petroleum Hydrocarbons, TR                                | 111.4        | mg/Kg         | 20  | 100        | 0     | 111              | 81.4          | 118             | 5.14    | 8.58        |             |
| Method: EPA Method 8015B: [                               | Diesel Range | Organics      |     |            |       |                  |               |                 |         |             |             |
| Sample ID: MB-27431                                       |              | MBLK          |     |            |       | Batch ID:        | 27431         | Analysi         | s Date: | 6/30/2011   | 10:30:13 AM |
| Diesel Range Organics (DRO)                               | ND           | mg/Kg         | 10  |            |       |                  |               |                 |         |             |             |
| Sample ID: LCS-27431                                      |              | LCS           |     |            |       | Batch ID:        | 27431         | Analysi         | s Date: | 6/30/2011 1 | 11:04:39 AM |
| Diesel Range Organics (DRO)                               | 51.29        | mg/Kg         | 10  | 50         | 0     | 103              | 66.7          | 119             |         |             |             |
| Sample ID: LCSD-27431                                     |              | LCSD          |     |            |       | Batch ID:        | 27431         | Analysis        | s Date: | 6/30/2011 1 | 1:39:10 AM  |
| Diesel Range Organics (DRO)                               | 54.65        | mg/Kg         | 10  | 50         | 0     | 109              | 66.7          | 119             | 6.34    | 18.9        |             |
| Method: EPA Method 8015B: 0                               | Gasoline Rar | nge           |     |            |       |                  |               |                 |         |             |             |
| Sample ID: 1106B73-02AMSD                                 |              | MSD           |     |            |       | Batch ID:        | 27433         | Analysis        | s Date: | 7/8/2011    | 6:02:44 PM  |
| Gasoline Range Organics (GRO)                             | 25.09        | mg/Kg         | 4.6 | 22.98      | 0     | 109              | 57.7          | 165             | 11.5    | 15.5        |             |
| Sample ID: MB-27433                                       |              | MBLK          |     |            |       | Batch ID:        | 27433         | Analysis        | s Date: | 7/2/2011    | 6:57:00 AM  |
| Gasoline Range Organics (GRO)<br>Sample ID: LCS-27433     | ND           | mg/Kg<br>LCS  | 5.0 |            |       | Batch ID:        | 27433         | Analysis        | s Date: | 7/2/2011    | 5:56:57 AM  |
| Gasoline Range Organics (GRO)<br>Sample ID: 1106B73-02AMS | 27.47        | mg/Kg<br>MS   | 5.0 | 25         | 0     | 110<br>Batch ID: | 88.8<br>27433 | 124<br>Analysis | s Date: | 7/8/2011    | 5:33:51 PM  |
| Gasoline Range Organics (GRO)                             | 28.14        | mg/Kg         | 4.9 | 24.44      | 0     | 115              | 57.7          | 165             |         |             |             |
|   |              |               |     |            |       |                  |               |                 |         |             |             |

Qualifiers:

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

# QA/QC SUMMARY REPORT

Client:

**Blagg Engineering** 

| Project: Lenis A Sha      | ane USA 1 |       |       |        |         |           |            |                | Work     | Order:   | 1106B73    |
|---------------------------|-----------|-------|-------|--------|---------|-----------|------------|----------------|----------|----------|------------|
| Analyte                   | Result    | Units | PQL   | SPK Va | SPK ref | %Rec L    | owLimit Hi | ghLimit        | %RPD.    | RPDLimi  | Qual       |
| Method: EPA Method 8021B: | Volatiles |       |       |        |         |           |            |                |          |          |            |
| Sample ID: 1106B73-01AMSD |           | MSD   |       |        |         | Batch ID: | 27433      | Analys         | is Date: | 7/7/2011 | 4:41:56 PM |
| Benzene                   | 0.8048    | mg/Kg | 0.047 | 0.944  | 0       | 85.2      | 67.2       | 113            | 0.306    | 14.3     |            |
| Toluene                   | 0.8848    | mg/Kg | 0.047 | 0.944  | 0       | 93.7      | 62.1       | 116            | 3.81     | 15.9     |            |
| Ethylbenzene              | 0.9121    | mg/Kg | 0.047 | 0.944  | 0       | 96.6      | 67.9       | 127            | 3.38     | 14.4     |            |
| Xylenes, Total            | 2.771     | mg/Kg | 0.094 | 2.833  | 0       | 97.8      | 60.6       | 134            | 3.22     | 12.6     |            |
| Sample ID: MB-27433       |           | MBLK  |       |        |         | Batch ID: | 27433      | Analysis Date: |          | 7/2/2011 | 6:57:00 AM |
| Benzene                   | ND        | mg/Kg | 0.050 |        |         |           |            |                |          |          |            |
| Toluene                   | ND        | mg/Kg | 0.050 |        |         |           |            |                |          |          |            |
| Ethylbenzene              | ND        | mg/Kg | 0.050 |        |         |           |            |                |          |          |            |
| Xylenes, Total            | ND        | mg/Kg | 0.10  |        |         |           |            |                |          |          |            |
| Sample ID: LCS-27433      |           | LCS   |       |        |         | Batch ID: | 27433      | Analys         | is Date: | 7/7/2011 | 3:43:54 PM |
| Benzene                   | 0.9055    | mg/Kg | 0.050 | 1      | 0       | 90.6      | 83.3       | 107            |          |          |            |
| Toluene                   | 0.9878    | mg/Kg | 0.050 | 1      | 0       | 98.8      | 74.3       | 115            |          |          |            |
| Ethylbenzene              | 1.006     | mg/Kg | 0.050 | 1      | 0       | 101       | 80.9       | 122            |          |          |            |
| Xylenes, Total            | 3.075     | mg/Kg | 0.10  | 3      | 0       | 102       | 85.2       | 123            |          |          |            |
| Sample ID: 1106B73-01AMS  |           | MS    |       |        |         | Batch ID: | 27433      | Analys         | is Date: | 7/7/2011 | 4:12:55 PM |
| Benzene                   | 0.8024    | mg/Kg | 0.046 | 0.928  | 0       | 86.5      | 67.2       | 113            |          |          |            |
| Toluene                   | 0.8518    | mg/Kg | 0.046 | 0.928  | 0       | 91.8      | 62.1       | 116            |          |          |            |
| Ethylbenzene              | 0.8818    | mg/Kg | 0.046 | 0.928  | 0       | 95.1      | 67.9       | 127            |          |          |            |
| Xylenes, Total            | 2.683     | mg/Kg | 0.093 | 2.783  | 0       | 96.4      | 60.6       | 134            |          |          |            |

Qualifiers:

Ε Estimated value

Analyte detected below quantitation limits J

ND Not Detected at the Reporting Limit

- Н Holding times for preparation or analysis exceeded
- NC Non-Chlorinated
- R RPD outside accepted recovery limits

## Hall Environmental Analysis Laboratory, Inc.

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|   | Sample           | e Rec  | eipt Cl        | necklist                               |                   |  |
|---|------------------|--------|----------------|--|-------------------|--|
| Client Name BLAGG                               |                  |        | Date Received: |  |                   | 6/29/2011                              |
| Work Order Number 1106B73                       |                  |        |                | Received t                             | oy: AT            |  |
|   | 1                | 4      | $\int \int $   | Sample ID                              | labels checked by | ·                                      |
| Checklist completed by:                         |                  |        | Dete           | [[                                     | -                 | Initials                               |
| Matrix:   | Carrier name     | Grey   | <u>yhound</u>  |  |                   |  |
| Shipping container/cooler in good condition?    |                  | Yes    |                | No 🗌                                   | Not Present       |  |
| Custody seals intact on shipping container/coo  | ler?             | Yes    |                | No 🗔                                   | Not Present       | Not Shipped                            |
| Custody seals intact on sample bottles?         |                  | Yes    |                | No 🗌                                   | N/A               |  |
| Chain of custody present?                       |                  | Yes    |                | No 🗌                                   |                   |  |
| Chain of custody signed when relinquished and   | received?        | Yes    |                | No 🗌                                   |                   |  |
| Chain of custody agrees with sample labels?     |                  | Yes    |                | No 🗔                                   |                   |  |
| Samples in proper container/bottle?             |                  | Yes    |                | No 🗌                                   |                   |  |
| Sample containers intact?                       |                  | Yes    |                | No 🗌                                   |                   |  |
| Sufficient sample volume for indicated test?    |                  | Yes    |                | No 🗔                                   |                   |  |
| All samples received within holding time?       |                  | Yes    |                | No 🗌                                   |                   | Number of preserved                    |
| Water - VOA vials have zero headspace?          | No VOA vials sub | mitted |                | Yes 🗌                                  | No 🗔              | bottles checked for<br>pH:             |
| Water - Preservation labels on bottle and cap n | natch?           | Yes    |                | No 🗔                                   | N/A 🗹             |  |
| Water - pH acceptable upon receipt?             |                  | Yes    |                | No 🗔                                   | N/A 🗹             | <2 >12 unless noted                    |
| Container/Temp Blank temperature?               |                  | 3.     | 6°             | <6° C Acceptal                         |                   | below.                                 |
| COMMENTS:                                       |                  |        |                | If given sufficier                     | t time to cool.   |  |
|   |                  |        |                |  |                   |  |
|   |                  |        |                |  |                   | -                                      |
|   |                  |        |                |  |                   |  |
|   |                  |        |                |  |                   |  |
|   |                  |        |                |  |                   |  |
|   |                  |        |                |  |                   |  |
| Client contacted                                | Date contacted:  |        |                | Per                                    | son contacted     |  |
| Contacted by:                                   | Regarding        |        |                |  |                   | i                                      |
| Comments:                                       |                  |        |                |  |                   |  |
|   |                  |        |                |  |                   |  |
| <u></u>   |                  |        |                | ······································ |                   |  |
|   |                  |        |                |  |                   | ······································ |
|   |                  |        |                |  |                   |  |
| Corrective Action                               |                  |        |                |  |                   |  |
|   |                  |        |                |  | <u></u>           |  |
|   |                  |        |                |  |                   |  |

