

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

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

Form C-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

12188
Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

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

45-13294 Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: BP America Production Company OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: Heath Gas Com A 1
API Number: 3004513294 OCD Permit Number:
U/L or Qtr/Qtr H Section 32 Township 30N Range 9W County: San Juan
Center of Proposed Design: Latitude 36.77154 Longitude -107.79841 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ Pit: Subsection F, G or J of 19.15.17.11 NMAC DIST. 3
Temporary: ☐ Drilling ☐ Workover RCVD SEP 5 '14
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
☐ String-Reinforced OIL CONS. DIV.
Liner Seams: ☐ Welded ☐ Factory ☐ Other Volume: bbl Dimensions: L x W x D

3.
☒ Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
Volume: 95.0 bbl Type of fluid: Produced water
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Single walled/double bottomed; side walls not visible
Liner type: Thickness mil ☐ HDPE ☐ PVC ☐ Other

4.
☐ Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.

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 _____

6.

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

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

7.

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

8.

Variances 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:

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

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

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

☐ Yes ☐ No
☐ NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.

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

☐ Yes ☐ No
☐ NA

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. (**Does not apply to below grade tanks**)

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

☐ Yes ☐ No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

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

☐ Yes ☐ No

Within an unstable area. (**Does not apply to below grade tanks**)

- 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. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☐ No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

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

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

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

☐ Yes ☐ No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

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

☐ Yes ☐ No

<p>Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.</p> <p>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 100 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Temporary Pit Non-low chloride drilling fluid</u></p>	
<p>Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <p>- Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;</p> <p>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p>	
<p>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).</p> <p>- Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <p>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.</p> <p>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <p>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

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

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

11.

Multi-Well Fluid Management Pit 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.

☐ 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
☐ A List of wells with approved application for permit to drill associated with the pit.
☐ 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
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

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 ☐ Multi-well Fluid Management Pit
☐ 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

14.

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

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C 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 H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

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

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 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 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

16.

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

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

Operator Application Certification:

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.

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

OCD Representative Signature: *Jonathan D. Kelly* Approval Date: 9/19/2014

Title: Compliance Officer OCD Permit Number: _____

19.

Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 9/27/2013

20.

Closure Method:

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

21.

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 for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☒ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.77154 Longitude -107.79841 NAD: ☐ 1927 ☒ 1983

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: Area Environmental Advisor

Signature:  Date: September 4, 2014

e-mail address: peace.jeffrey@bp.com Telephone: (505) 326-9479

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Heath Gas Com A 1

API No. 3004513294

Unit Letter H, Section 32, T30N, R9W

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.
No notice was sent due to misunderstanding of BGT closure notice requirements at that time.
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 sent due to misunderstanding of BGT closure notice requirements at that time.
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 95 bbl BGT	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

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

Soil under the BGT was sampled and BTEX, TPH and chloride levels were below the stated limits. Sampling data is attached.

7. BP shall notify the division District III office of its results on form C-141.
C-141 is attached.
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
Stained soil near the BGT was observed and sampling results indicate a minor non-reportable release occurred from a pipe. TPH was 6,710 ppm by Method 8015D. Less than one cubic yard of impacted material was removed from a depth of 5.5 feet to a depth of 7 feet, where shale bedrock was encountered. Subsequent soil sample at 7 feet was non-detect for TPH. Due to depth to groundwater and distance to surface waters the closure standard is 1,000 ppm TPH.
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not within the active process area
The area under the BGT was backfilled with clean soil and will be reclaimed with the rest of the site since the well has been plugged and abandoned.
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 will be reclaimed as part of final reclamation since the well has been plugged and abandoned.
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 will be reclaimed as part of final reclamation since the well has been plugged and abandoned.
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 will be reclaimed as part of final reclamation since the well has been plugged and abandoned.

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 as part of final reclamation since the well has been plugged and abandoned.

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

BP will notify NMOCD when re-vegetation is successful.

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;

- a. proof of closure notification (surface owner and NMOCD)
- b. sampling analytical reports; information required by 19.15.17 NMAC;
- c. disposal facility name and permit number
- d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
- e. site reclamation, photo documentation.

Closure report on C-144 form is included.

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

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.
Santa Fe, NM 87505

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: Heath Gas Com A 1	Facility Type: Natural gas well

Surface Owner: Federal	Mineral Owner: Federal	API No. 3004513294
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LOCATION OF RELEASE

Unit Letter H	Section 32	Township 30N	Range 9W	Feet from the 1,600	North/South Line North	Feet from the 1,090	East/West Line East	County: San Juan
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Latitude 36.77154 Longitude 107.79841

NATURE OF RELEASE

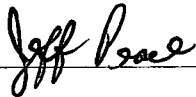
Type of Release: oil/condensate	Volume of Release: unknown	Volume Recovered: none
Source of Release: pipe near below grade tank – 95 bbl	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: 9/17/2013; 3:18 PM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in BTEX, TPH and chloride below standards beneath the BGT, but stained soil near the BGT was observed and sample results showed 6,500 ppm DRO and 210 ppm GRO by Method 8015D. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. Soil under the BGT showed no impacts, but soil near the BGT showed impacts due to a pipe leak. Impacted soil was removed from 5.5 ft below grade to 7 feet below grade, where shale bedrock was encountered. Subsequent soil samples at 7 feet were non-detect for TPH. Due to the depth to groundwater and distance to surface water the closure standard for this site is 1,000 ppm TPH. No further action was taken. This area will be reclaimed with the rest of the site since the well has been plugged and abandoned.

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

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Jeff Peace	Approved by Environmental Specialist:		
Title: Area Environmental Advisor	Approval Date:	Expiration Date:	
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: September 4, 2014	Phone: 505-326-9479		

* Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004513294 TANK ID (if applicable): A
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FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:

PAGE #: **1** of **1**

SITE INFORMATION:	SITE NAME: HEATH GC A # 1	DATE STARTED: 09/17/13
QUAD/UNIT: H SEC: 32 TWP: 30N RNG: 9W PM: NM CNTY: SJ ST: NM		DATE FINISHED:
1/4 - 1/4 FOOTAGE: 1,600'N / 1,090'E SE/NE LEASE TYPE: <u>FEDERAL</u> STATE / FEE / INDIAN		ENVIRONMENTAL SPECIALIST(S): NJV
LEASE #: SF076337 PROD. FORMATION: MV CONTRACTOR: ELKHORN MBF - T. PETERSON		

REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.: 36.77119 X 107.79848 GL ELEV.: 5,757'	
1) 95 BGT (SW/DB)	GPS COORD.: 36.77154 X 107.79841	DISTANCE/BEARING FROM W.H.: 137.5', N12E
2)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:
3)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:
4)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:

SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL	OVM READING (ppm)
1) SAMPLE ID: 5 PC-TB @ 5' (95) SAMPLE DATE: 09/17/13 SAMPLE TIME: 1518 LAB ANALYSIS: 418.1/8015B/8021B/300.0 (CI)		NA
2) SAMPLE ID: (1) @ 5' (95) SAMPLE DATE: 09/17/13 SAMPLE TIME: 1510 LAB ANALYSIS: 8015B/8021B		NA
3) SAMPLE ID: (1) @ 7' (95) SAMPLE DATE: 09/17/13 SAMPLE TIME: 1515 LAB ANALYSIS: 8015B/8021B		NA
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:

SOIL DESCRIPTION:	SOIL TYPE: SAND / <u>SILTY SAND</u> SILT / <u>SILTY CLAY</u> / CLAY / GRAVEL / <u>OTHER</u> BEDROCK (SHALE) AT APPROX. 7' BELOW GRADE. SOIL COLOR: OLIVE TO MEDIUM DARK GRAY COHESION (ALL OTHERS): NON COHESIVE / <u>SLIGHTLY COHESIVE</u> / COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): LOOSE / <u>FIRM</u> / DENSE / VERY DENSE MOISTURE: DRY / <u>SLIGHTLY MOIST</u> / MOIST / WET / SATURATED / SUPER SATURATED SAMPLE TYPE: <u>GRAB / COMPOSITE</u> - # OF PTS. 5 DISCOLORATION/STAINING OBSERVED: <u>YES</u> NO EXPLANATION - MEDIUM TO DARK GRAY APPROXIMATELY 5' - 6' BELOW GRADE (SEE SITE SKETCH OF GRAB S.P.D.). ANY AREAS DISPLAYING WETNESS: YES / <u>NO</u> EXPLANATION - APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: <u>YES</u> NO EXPLANATION: NON BGT INTEGRITY ISSUE (PIPING RELATED). ADDITIONAL COMMENTS: GAS WELL RECENTLY PLUGGED AND ABANDONED (P&A). MINOR SOIL IMPACTS AND GRAB SAMPLE (< 5 C.Y.) NON REPORTABLE QUANTITY. MIXED AND LEFT IN PLACE. SOIL IMPACT DIMENSION ESTIMATION: 7 ft. X 5 ft. X 2 ft. EXCAVATION ESTIMATION (Cubic Yards): <5 DEPTH TO GROUNDWATER: >100' NEAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: <1,000' NMOC DTPH CLOSURE STD: 1,000 ppm
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SITE SKETCH

TO P & A MARKER

PLOT PLAN circle: attached

OVM CALIB. READ. = **NA** ppm RF = 0.52

OVM CALIB. GAS = **NA** ppm

TIME: **NA** am/pm DATE: **NA**

MISCELL. NOTES

WO: **N15224735**

PO #:

PK: **ZFEIRK0SJS**

PJ #:

Permit date(s): **06/02/10**

OCD Appr. date(s): **03/11/13**

Tank ID	OVM = Organic Vapor Meter ppm = parts per million
A	BGT Sidewalls Visible: Y <u>(N)</u>
	BGT Sidewalls Visible: Y / N
	BGT Sidewalls Visible: Y / N

Magnetic declination: **10° E**

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

X - S.P.D.

TRAVEL NOTES:	CALLOUT:	ONSITE: 09/17/13
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Analytical Report

Lab Order 1309916

Date Reported: 9/27/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB@5'(95)

Project: Heath GC A #1

Collection Date: 9/17/2013 3:18:00 PM

Lab ID: 1309916-001

Matrix: SOIL

Received Date: 9/19/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: BCN
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	9/24/2013 10:16:52 PM	9414
Surr: DNOP	103	63-147		%REC	1	9/24/2013 10:16:52 PM	9414
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	9/23/2013 5:12:41 PM	9416
Surr: BFB	90.2	80-120		%REC	1	9/23/2013 5:12:41 PM	9416
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.047		mg/Kg	1	9/23/2013 5:12:41 PM	9416
Toluene	ND	0.047		mg/Kg	1	9/23/2013 5:12:41 PM	9416
Ethylbenzene	ND	0.047		mg/Kg	1	9/23/2013 5:12:41 PM	9416
Xylenes, Total	ND	0.094		mg/Kg	1	9/23/2013 5:12:41 PM	9416
Surr: 4-Bromofluorobenzene	96.2	80-120		%REC	1	9/23/2013 5:12:41 PM	9416
EPA METHOD 300.0: ANIONS							Analyst: JRR
Chloride	ND	1.5		mg/Kg	1	9/24/2013 1:19:09 AM	9440
EPA METHOD 418.1: TPH							Analyst: BCN
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	9/24/2013	9464

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

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

Analytical Report

Lab Order 1309916

Date Reported: 9/27/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 1@5'(95)

Project: Heath GC A #1

Collection Date: 9/17/2013 3:10:00 PM

Lab ID: 1309916-002

Matrix: SOIL

Received Date: 9/19/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: JME
Diesel Range Organics (DRO)	6500	100		mg/Kg	10	9/25/2013 10:36:56 AM	9414
Surr: DNOP	0	63-147	S	%REC	10	9/25/2013 10:36:56 AM	9414
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	210	4.9		mg/Kg	1	9/23/2013 5:41:19 PM	9416
Surr: BFB	2090	80-120	S	%REC	1	9/23/2013 5:41:19 PM	9416
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.049		mg/Kg	1	9/23/2013 5:41:19 PM	9416
Toluene	ND	0.049		mg/Kg	1	9/23/2013 5:41:19 PM	9416
Ethylbenzene	ND	0.049		mg/Kg	1	9/23/2013 5:41:19 PM	9416
Xylenes, Total	1.5	0.098		mg/Kg	1	9/23/2013 5:41:19 PM	9416
Surr: 4-Bromofluorobenzene	237	80-120	S	%REC	1	9/23/2013 5:41:19 PM	9416

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

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

Analytical Report

Lab Order 1309916

Date Reported: 9/27/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 1@7'(95)

Project: Heath GC A #1

Collection Date: 9/17/2013 3:15:00 PM

Lab ID: 1309916-003

Matrix: SOIL

Received Date: 9/19/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: BCN
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	9/25/2013 12:22:45 AM	9414
Surr: DNOP	103	63-147		%REC	1	9/25/2013 12:22:45 AM	9414
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	9/23/2013 7:07:01 PM	9416
Surr: BFB	86.2	80-120		%REC	1	9/23/2013 7:07:01 PM	9416
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.048		mg/Kg	1	9/23/2013 7:07:01 PM	9416
Toluene	ND	0.048		mg/Kg	1	9/23/2013 7:07:01 PM	9416
Ethylbenzene	ND	0.048		mg/Kg	1	9/23/2013 7:07:01 PM	9416
Xylenes, Total	ND	0.096		mg/Kg	1	9/23/2013 7:07:01 PM	9416
Surr: 4-Bromofluorobenzene	90.1	80-120		%REC	1	9/23/2013 7:07:01 PM	9416

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	MB-9440	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	9440	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386349	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-9440	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	9440	RunNo:	13571					
Prep Date:	9/23/2013	Analysis Date:	9/23/2013	SeqNo:	386350	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.9	90	110			

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	MB-9464	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	9464	RunNo:	13580					
Prep Date:	9/24/2013	Analysis Date:	9/24/2013	SeqNo:	386593	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-9464	SampType:	LCS	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS	Batch ID:	9464	RunNo:	13580					
Prep Date:	9/24/2013	Analysis Date:	9/24/2013	SeqNo:	386594	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	110	20	100.0	0	107	80	120			

Sample ID	LCSD-9464	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID:	9464	RunNo:	13580					
Prep Date:	9/24/2013	Analysis Date:	9/24/2013	SeqNo:	386595	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	100	20	100.0	0	103	80	120	3.89	20	

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	MB-9414	SampType:	MBLK		TestCode:	EPA Method 8015D: Diesel Range Organics				
Client ID:	PBS	Batch ID:	9414		RunNo:	13509				
Prep Date:	9/20/2013	Analysis Date:	9/20/2013		SeqNo:	384395	Units:	mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	7.0		10.00		69.6	63	147			

Sample ID	MB-9400	SampType:	MBLK		TestCode:	EPA Method 8015D: Diesel Range Organics				
Client ID:	PBS	Batch ID:	9400		RunNo:	13510				
Prep Date:	9/19/2013	Analysis Date:	9/20/2013		SeqNo:	384407	Units:	%REC		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	11		10.00		107	63	147			

Sample ID	LCS-9400	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	9400	RunNo:	13510					
Prep Date:	9/19/2013	Analysis Date:	9/20/2013	SeqNo:	384408	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	5.6		5.000		113	63	147			

Sample ID	1309773-004AMS	SampType:	MS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	BatchQC	Batch ID:	9400	RunNo:	13510					
Prep Date:	9/19/2013	Analysis Date:	9/20/2013	SeqNo:	384427	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	5.1		5.015		102	63	147			

Sample ID	1309773-004AMSD	SampType:	MSD	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	BatchQC	Batch ID:	9400	RunNo:	13510					
Prep Date:	9/19/2013	Analysis Date:	9/20/2013	SeqNo:	384432	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	5.0		4.975		101	63	147	0	0	

Sample ID	LCS-9414	SampType: LCS			TestCode: EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID: 9414			RunNo: 13510					
Prep Date:	9/20/2013	Analysis Date: 9/20/2013			SeqNo: 384988		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	58	10	50.00	0	116	77.1	128			
Surr: DNOP	5.3		5.000		105	63	147			

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	1309739-001AMS	SampType:	MS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	BatchQC	Batch ID:	9414	RunNo:	13566					
Prep Date:	9/20/2013	Analysis Date:	9/24/2013	SeqNo:	386709	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	40	10	49.85	0	79.3	61.3	138			
Surr: DNOP	4.9		4.985		98.7	63	147			

Sample ID	1309739-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	BatchQC	Batch ID:	9414	RunNo:	13566					
Prep Date:	9/20/2013	Analysis Date:	9/24/2013	SeqNo:	386710	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	36	10	49.85	0	72.0	61.3	138	9.62	20	
Surr: DNOP	4.8		4.985		95.5	63	147	0	0	

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	MB-9416	SampType:	MBLK		TestCode:	EPA Method 8015D: Gasoline Range				
Client ID:	PBS	Batch ID:	9416		RunNo:	13551				
Prep Date:	9/20/2013	Analysis Date:	9/23/2013		SeqNo:	385515	Units:	mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual

Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	940		1000		93.5	80	120			

Sample ID	LCS-9416	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	9416	RunNo:	13551					
Prep Date:	9/20/2013	Analysis Date:	9/23/2013	SeqNo:	385517	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual

Gasoline Range Organics (GRO)	23	5.0	25.00	0	90.9	74.5	126			
Surr: BFB	1000		1000		104	80	120			

Sample ID	1309742-001AMS	SampType:	MS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	BatchQC	Batch ID:	9416	RunNo:	13551					
Prep Date:	9/20/2013	Analysis Date:	9/23/2013	SeqNo:	385528	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual

Gasoline Range Organics (GRO)	21	4.7	23.47	0	87.8	76	156			
Surr: BFB	930		939.0		98.7	80	120			

Sample ID	1309742-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	BatchQC	Batch ID:	9416	RunNo:	13551					
Prep Date:	9/20/2013	Analysis Date:	9/23/2013	SeqNo:	385531	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual

Gasoline Range Organics (GRO)	21	4.7	23.50	0	87.6	76	156	0.134	17.7	
Surr: BFB	920		939.8		98.2	80	120	0	0	

Qualifiers:

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

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

20

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309916

27-Sep-13

Client: Blagg Engineering

Project: Heath GC A #1

Sample ID	MB-9416		SampType:	MBLK		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	PBS		Batch ID:	9416		RunNo:	13551			
Prep Date:	9/20/2013		Analysis Date:	9/23/2013		SeqNo:	385554		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120			

Sample ID	LCS-9416		SampType:	LCS		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	LCSS		Batch ID:	9416		RunNo:	13551			
Prep Date:	9/20/2013		Analysis Date:	9/23/2013		SeqNo:	385555		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.050	1.000	0	95.6	80	120			
Toluene	0.96	0.050	1.000	0	95.8	80	120			
Ethylbenzene	0.96	0.050	1.000	0	95.7	80	120			
Xylenes, Total	2.9	0.10	3.000	0	96.3	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			

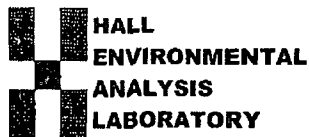
Sample ID	1309739-001AMS		SampType:	MS		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	BatchQC		Batch ID:	9416		RunNo:	13551			
Prep Date:	9/20/2013		Analysis Date:	9/23/2013		SeqNo:	385557		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.79	0.047	0.9381	0	84.1	67.3	145			
Toluene	0.80	0.047	0.9381	0.003965	84.9	66.8	144			
Ethylbenzene	0.81	0.047	0.9381	0	86.9	61.9	153			
Xylenes, Total	2.5	0.094	2.814	0	87.4	65.8	149			
Surr: 4-Bromofluorobenzene	0.99		0.9381		105	80	120			

Sample ID	1309739-001AMSD		SampType:	MSD		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	BatchQC		Batch ID:	9416		RunNo:	13551			
Prep Date:	9/20/2013		Analysis Date:	9/23/2013		SeqNo:	385561		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.83	0.047	0.9398	0	88.7	67.3	145	5.53	20	
Toluene	0.84	0.047	0.9398	0.003965	88.6	66.8	144	4.41	20	
Ethylbenzene	0.85	0.047	0.9398	0	90.3	61.9	153	4.02	20	
Xylenes, Total	2.5	0.094	2.820	0	90.4	65.8	149	3.52	20	
Surr: 4-Bromofluorobenzene	0.99		0.9398		105	80	120	0	0	

Qualifiers:

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

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



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

Sample Log-In Check List

Client Name: **BLAGG**

Work Order Number: **1309916**

RcptNo: **1**

Received by/date:

lm

09/19/13

Logged By: **Ashley Gallegos**

9/19/2013 10:00:00 AM

Completed By: **Ashley Gallegos**

9/19/2013 7:33:26 PM

Reviewed By:

[Signature]

09/20/13

Chain of Custody

1. Custody seals intact on sample bottles? Yes No Not Present ✓
2. Is Chain of Custody complete? Yes ✓ No Not Present
3. How was the sample delivered? Courier

Log In

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

of preserved
bottles checked
for pH:

(<2 or >12 unless noted)

Adjusted?

Checked by:

Special Handling (if applicable)

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

Person Notified:

Date:

By Whom:

Via:

eMail

Phone

Fax

In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

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

Chain-of-Custody Record

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

Mailing Address: P.O. BOX 87

BLOOMFIELD, NM 87413

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

email or Fax#:

QA/QC Package:

☒ Standard ☐ Level 4 (Full Validation)

Accreditation:

☐ NELAP ☐ Other☐ EDD (Type) _____

Turn-Around Time:

☒ Standard ☐ Rush _____

Project Name:

HEATH GC A # 1

Project #:

Project Manager:

NELSON VELEZ

Sampler: NELSON VELEZ

On Ice: ☒ Yes ☐ No

Sample Temperature: 10

[illegible]

Date: ,	Time:	Relinquished by:
---------	-------	------------------

7/18/13 904

Relinquished by:

Mark

Received by:

Winter, Wash.

Date	Time
------	------

9/18/12 904

Remarks:

BILL DIRECTLY TO BP:

Jeff Peace, 200 Energy Court, Farmington, NM 87401

Work Order: N15224735 Paykey: ZFEIRKOSJS

Date:	Time:	Relinquished by:
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711813	1737
--------	------

Relinquished by:

Christine Walters

Received by

U. S. 1

Date	Time
------	------

13 1000

Remarks:

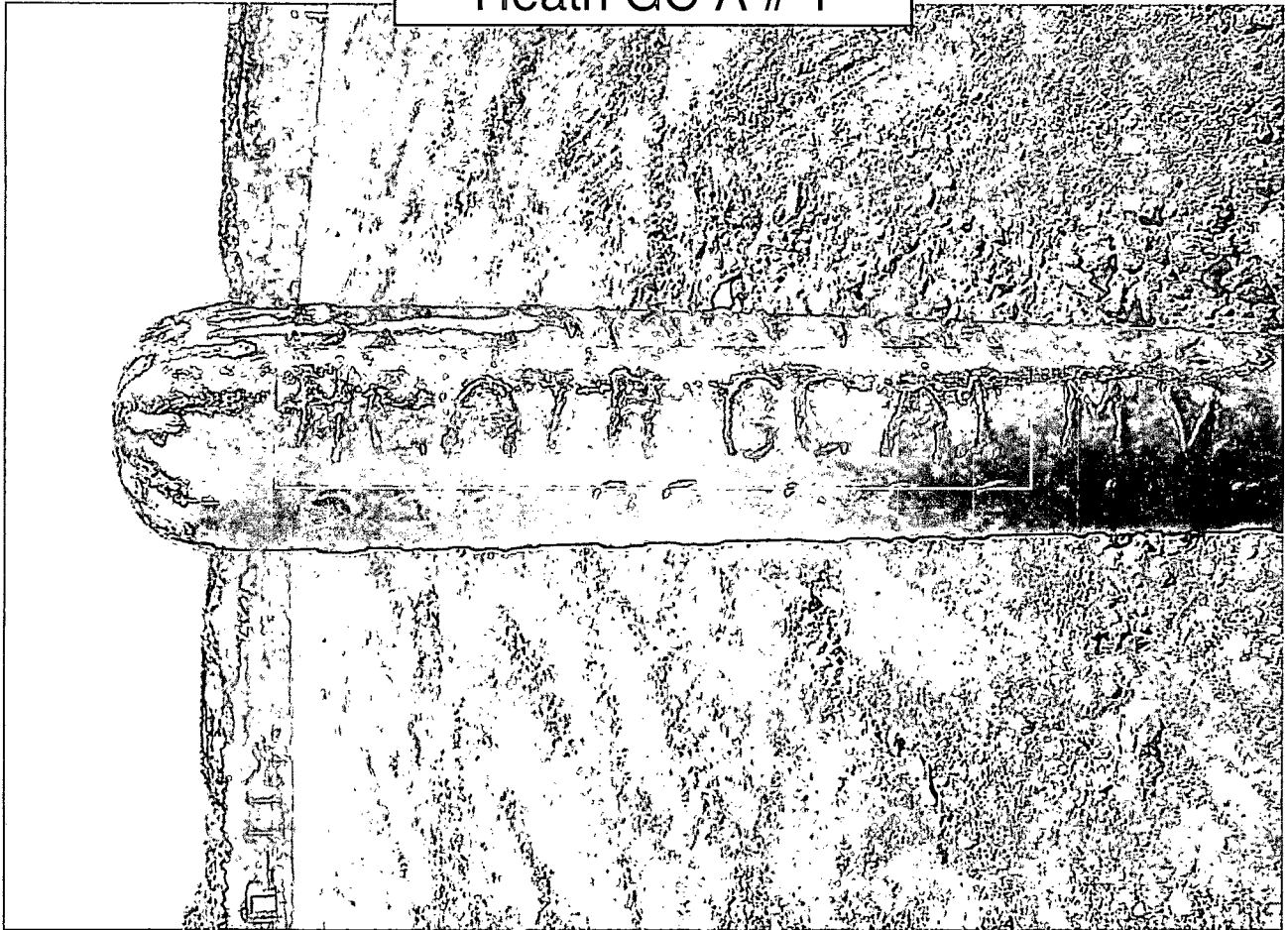
BILL DIRECTLY TO BP:

Jeff Peace, 200 Energy Court, Farmington, NM 87401

Work Order: N15224735 Paykey: ZFEIRKOSJS

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

Heath GC A # 1



Previous 95 bbl BGT
Position (Tank ID: A)

Plugged &
Abandoned Marker

