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.

10017	Pit, Below-Grade Tank, or	·
12217	Proposed Alternative Method Permit or Closure Plan Appli	cation
	Type of action: Below grade tank registration	RCVD SEP 26'14
45-2632	Permit of a pit or proposed alternative method	OIL CONS. DIV.
	Closure of a pit, below-grade tank, or proposed alternative method  Modification to an existing permit/or registration	DIST. 3
	Closure plan only submitted for an existing permitted or non-permitte	d pit, below-grade tank,
•	or proposed alternative method	
	Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or a	
environment. Nor do	t approval of this request does not relieve the operator of liability should operations result in pollution of su ses approval relieve the operator of its responsibility to comply with any other applicable governmental auth	ority's rules, regulations or ordinances.
1.		
	nerica Production Company OGRID #:778	
Address:200 H	Energy Court, Farmington, NM 87401	
Facility or well na	me:Gallegos Canyon Unit 84E	
API Number:	3004526340OCD Permit Number:	
U/L or Qtr/Qtr	_GSection26Township28NRange13WCounty:	San Juan
Center of Proposed	d Design: Latitude36.63503 Longitude108.18602	NAD: □1927 ⊠ 1983
Surface Owner:	Federal 🗌 State 🗌 Private 🔀 Tribal Trust or Indian Allotment	
2.		
Pit: Subsecti	on F, G or J of 19.15.17.11 NMAC	
Temporary: $\square$ D	rilling Workover	
Permanent	Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Dr	illing Fluid 🔲 yes 🔲 no
	ined Liner type: Thicknessmil LLDPE HDPE PVC Other	
☐ String-Reinford		
Liner Seams: U	Welded Factory Other Volume: bbl Dimensions:	Lx Wx D
3,		
Below-grade t	ank: Subsection I of 19.15.17.11 NMAC Tank A	
Volume:9	5.0bbl Type of fluid:Produced water	
Tank Construction	material: Steel	
☐ Secondary cor	tainment with leak detection 🔲 Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off	
☐ Visible sidewa	Ils and liner 🛛 Visible sidewalls only 🗌 Other _Single walled/single bottomed	
Liner type: Thicks	nessmil	
4.		
Alternative M		
Submittal of an ex-	ception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau offi	ce for consideration of approval.

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church)  Four foot height, four strands of barbed wire evenly spaced between one and four feet  Alternate. Please specify	hospital,
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)	
Montally inspections (if netting or screening is not physically reasible)	
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	
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.	
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 acceptant are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
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
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (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
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</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. (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

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	Yes No
Within 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.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
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).  - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a 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; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of	
initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do 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 19.15.17.5  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. and 19.15.17.13 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
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 do 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.	cuments are
Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 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	.15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are						
attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment							
Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC							
Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC							
Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan							
<ul> <li>☐ Emergency Response Plan</li> <li>☐ Oil Field Waste Stream Characterization</li> <li>☐ Monitoring and Inspection Plan</li> </ul>							
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							
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 F	luid Management Pit						
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							
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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	attached to the						
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	ce material are llease refer to						
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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ NA						
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA						
Within 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							
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No						
Within 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	☐ Yes ☐ No						
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No						
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance							

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 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	
Within a 100-year floodplain.	☐ Yes ☐ No
- FEMÁ map	☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 19.15.17.13 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  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  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	1 NMAC 5.17.11 NMAC
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 believe	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address:	
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 1921/6	2014
10	
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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	complete this
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
The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure require	
Name (Print):Jeff Peace	Title: Area Environmental Advisor
Signature: Jeff Rease	Date:September 25, 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

#### Gallegos Canyon Unit 84E API No. 3004526340 Unit Letter G, Section 26, T28N, R13W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD 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. This work was done outside the regular BGT compliance project and the person responsible for sending the closure notices was not aware of the planned BGT removal. This has been discussed again amongst the various construction planners and crews to make sure the BGT team knows of upcoming BGT removals and closures so the proper notices can be sent.
- 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. This work was done outside the regular BGT compliance project and the person responsible for sending the closure notices was not aware of the planned BGT removal. This has been discussed again amongst the various construction planners and crews to make sure the BGT team knows of upcoming BGT removals and closures so the proper notices can be sent.

- 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
	95 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	71.8
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.

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

Sampling results indicate no release occurred.

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

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

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

The area over the 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 as part of final reclamation.

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.

<u>District 1</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 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**

Revised August 8, 2011

Form C-141

Oil Conservation Division 1220 South St. Francis Dr. Santa Ea NIM 97505

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

				<u> </u>	aiita i c	, INIVI 673	03							
			Rel	ease Notific	cation	and Co	orrective A	ction						
						OPERA'	ГOR		Initia	l Report	$\boxtimes$	Final Report		
Name of Co	ompany: B	P				Contact: Jeff Peace								
			ington, N	M 87401	- ,									
Surface Ow	mer: Triba	1		Mineral (	Owner:	Γribal		Al	PI No.	30045263	40			
				LOCA	ATION	OF RE	LEASE							
Unit Letter G	Section 26	Township 28N	Range 13W	Feet from the 1,830	North/ North	South Line	Feet from the 1,830	East/West I East	Line	County: Sa	ın Juan			
	<u></u>	Lat	itude 3	⊥ 6.63503	<u> </u>	Longitud	108 18602	1						
		Dat	itude5											
Type of Rele	ase: none			NAI	UKE			Vol	ume R	ecovered: N	I/A			
Source of Release: below grade tank – 95 bbl							lour of Occurrence	e: Date	and F	lour of Disc	overy:	N/A		
Was Immediate Notice Given?  If YES, To Whom?														
		<u></u>	Yes _	J No ⊠ Not R	equired									
Was a Watercourse Reached?  ☐ Yes ☑ No ☐ Yes ☑ No														
If a Watercou	ırse was Im	pacted. Descr	ibe Fully.	*		1								
			,											
									oval to	o ensure no	soil im	pacts from		
the BGT. So	il analysis i	esulted in TP	H, BTEX	and chlorides belo	ow stand	ards. Analys	is results are attac	ched.						
Describe Are	a Δffected	and Cleanup	Action Tal	cen * BGT was re	moved a	nd the area u	nderneath the BG	T was sample	d Th	e area unde	r the R	GT was		
					moveu a	na nic arca u	nderneath the BO	i was sampic	.u. 111	c area unuc	the D	O1 was		
odenimed an	a compare	a and 10 0000 ,	, , , , , , , , , , , , , , , , , , , ,	active wentarea.										
							·							
				otance of a C-141	report do	ses not reliev	e the operator of i	responsibility	for co	mpiiance w	itn any	otner		
· · · · · · · · · · · · · · · · · · ·	Name of Company: BP Address: 200 Energy Court, Farmington, NM 8740  Telephone No.: 505-326-9479 Facility Name: Gallegos Canyon Unit 845  Surface Owner: Tribal Mineral Owner: Tribal API No. 3004\$26340  LOCATION OF RELEASE  Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line East  Latitude 36.63503  Longitude 108.18602  NATURE OF RELEASE  Volume of Release: N/A Volume Recovered: N/A  Date and Hour of Occurrence: Date and Hour of Discovery: N/A N/A  Was Immediate Notice Given? Yes No Not Required  By Whom?  Was a Watercourse Reached? Yes No  Before the Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chlorides below standards. Analysis results are attached.  berefy certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and gualities and perform corrective actions for releases which may endanger sublic health or the environment. In addition, NMOCD acceptance of a C-141 report obes not relieve the operator of liability hand their operations have filed on dequality investigation and report of complete to the best of my knowledge and understand that pursuant to NMOCD rules and gualities all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger sublic health or the environment. The acceptance of a C-141 report obes not relieve the operator of liability hand their operations have filed on deductive investigate and remediate comminisation hat pose a threat to ground vater, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of personsibility for compliance.  OIL CONSERVATION DIVISION  Approved by Environmental Specialist:  Approved by Environmental Specialist:													
	Contact: Jeff Peace   Contact: Jeff Peace													
Signature:	Jalk	Page 2	•											
Surface Owner: Tribal														
Printed Name	e: Jeff Peac	e			'			poeianst.						
Title: Area E	nvironment	al Advisor				Approval Dat	e:	Expira	ation [	Date:				
E-mail Addre	ess: peace.io	effrey@bp.co	n			Conditions of	Approval:							
	1			·						Attached	1 1			

Phone: 505-326-9479

Date: September 25, 2014 \* Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413	API#: 3004526340								
	(505) 632-1199	TANK ID (if applicble):								
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE#:1_ of1_								
		DATE STARTED:								
•		DATE HINGHED.								
	CTDIVE	LITTO COLUMN COL								
	PROD. FORMATION: DK CONTRACTOR: MBF - K, LEMONS	SPECIALIST(S): JCB								
4) GPS COORD.: DISTANCE/BEARING FROM W.H.:										
SAMPLING DATA: CHAIN OF CUSTODY RECORD(S) # OR LAB USED: Envirotech										
		READING (ppm)								
1		i								
The state of the s										
COHESION (ALL OTHERS) NON COHESIVE SLIGHTL CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST / W SAMPLE TYPE: GRAB COMPOSITE 1	SOIL COLOR: DARK YELLOWSH ORANGE  COHESION (ALL OTHERS) NON COHESIVE) SLIGHTLY COHESIVE / COHESIVE / CHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD  CONSISTENCY (NON COHESIVE SOILS): LOOSE) FIRM / DENSE / VERY DENSE  MOISTURE: DRY SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED  SAMPLE TYPE: GRAB COMPOSITE # OF PTS. 5  ANY AREAS DISPLAYING WETNESS: YES NO EXPLANATION -									
APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA:	D AND/OR OCCURRED : YES NO EXPLANATION: YES NO EXPLANATION -									
		,								
		MOCD TPH CLOSURE STD: 1,000 ppm								
SITE SKETCH  ENTRANCE  GATE —  METER  RUN —	PERIMETER - 1	DVM CALIB. GAS = 100 ppm								
	STEEL									
	CONTAINMENT	· · · · · · · · · · · · · · · · · · ·								
SEPARATOR —										
PRCTI	OCD Appr. date(s): 04/23/14									
T.B. ~ 6'	ID ppm = parts per million									
SITE INFORMATION: SIENME GCU#84E  QUADIUNT G SEC: 26 TMP: 28N RNG: 13W PM: NM CNTY: SJ ST: NM  MILLEASE #: 1449-IND-8472 PROD FORMATION DK CONTRACTOR MBF: KLEMONS  PROD FORMATION DK CONTRACTOR MBF: KLEMONS  TYPE FEDERAL / STATE / FEE[NDIAN]  REFERENCE POINT: WELL HEAD (WH), OPS COORD: 36.63549 X 108.18581  QUE SECOND: OST COORD: OST COORD: 0ST COORD:										
NOTES - BCT - BELOWINGDADE TANK ED - EVOALATE										
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL	OW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT	Magnetic declination: 10° E								
	00/04/44									



Project Name:

GCU 84E

PO Box 22024

Project Number: Tulsa OK, 74121-2024 Project Manager: 03143-0424 Jeff Blagg

Reported:

05-Aug-14 09:37

#### 95 BGT 5-pt @ 6' P408001-01 (Solid)

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
Toluene	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
Ethylbenzene	ND	0.05	mg/kg	t	1431023	08/01/14	08/04/14	EPA 8021B	
p,m-Xylene	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
o-Xylene	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
Total Xylenes	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
Total BTEX	ND	0.05	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8021B	
Surrogate: Bromochlorobenzene		102 %	80	-120	1431023	08/01/14	08/04/14	EPA 8021B	
Surrogate: 1,3-Dichlorobenzene		100 %	80	-120	1431023	08/01/14	08/04/14	EPA 8021B	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	ND	4.99	mg/kg	1	1431023	08/01/14	08/04/14	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	35.0	mg/kg	1	1432002	08/04/14	08/04/14	EPA 8015D	
Surrogate: Benzo[a]pyrene	,	70.4 %	50	-200	1432002	08/04/14	08/04/14	EPA 8015D	
Total Petroleum Hydrocarbons by 418.1						<u> </u>			
Total Petroleum Hydrocarbons	71.8	34.9	mg/kg	l	1432003	08/04/14	08/04/14	EPA 418.1	
Cation/Anion Analysis									
Chloride	ND	9.96	mg/kg	1	1431024	08/01/14	08/01/14	EPA 300.0	



Project Name:

GCU 84E

PO Box 22024

Project Number: Tulsa OK, 74121-2024

03143-0424

Spike

Source

Project Manager:

Reporting

Jeff Blagg

Reported:

05-Aug-14 09:37

RPD

%REC

#### Volatile Organics by EPA 8021 - Quality Control

#### **Envirotech Analytical Laboratory**

		Reporting		Spike	Source		/orceC		KrD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1431023 - Purge and Trap EPA	5030A					-				
Blank (1431023-BLK1)				Prepared: (	)1-Aug-14	Analyzed:	04-Aug-14			
Benzene	ND	0.05	mg/kg							
Toluene	ND	0.05	"							
Ethylbenzene	ND	0.05	n							
o,m-Xylene	ND	0.05	u							
o-Xylene	ND	0.05	п							
Total Xylenes	ND	0.05	*1							
Total BTEX	ND	0.05	ш							
Surrogate: 1,3-Dichlorobenzene	48.8		ug/L	50.0		97.5	80-120			
Surrogate: Bromochlorobenzene	51.5		"	50.0		103	80-120			
Duplicate (1431023-DUP1)	Sou	rce: P407115-	01	Prepared: 01-Aug-14 Analyzed: 04-Aug-14						
Benzene	ND	0.05	mg/kg		ND				30	
Toluene	ND	0.05	н		ND				30	
Ethylbenzene	ND	0.05	11		ND				30	
p,m-Xylene	ND	0.05	11		ND				30	
o-Xylene	ND	0.05	31		ND				30	
Surrogate: 1,3-1)ichlorobenzene	47.2		ug/L	50.0		94.4	80-120			
Surrogate: Bromochlorobenzene	50.2		"	50.0		100	80-120			
Matrix Spike (1431023-MS1)	Sou	rce: P407115-	01	Prepared: 01-Aug-14 Analyzed: 04-Aug-14						
Benzene	46.1		ug/L	50.0	ND	92.1	39-150			
l'oluene l'alle	46,5		11	50.0	ND	93.0	46-148			
Ethylbenzene	46.6		11	50.0	ND	93.1	32-160			
o,m-Xylene	93.3		11	100	ND	93.3	46-148			
-Xylene	46.8		n	50.0	ND	93.7	46-148			

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48.7

52.6

Surrogate: 1,3-Dichlorobenzene

Surrogate: Bromochlorobenzene

50.0

97.4

105

80-120

80-120



Tulsa OK, 74121-2024

Project Name:

GCU 84E

PO Box 22024

Project Number:

03143-0424

Project Manager:

Jeff Blagg

Reported:

05-Aug-14 09:37

#### Nonhalogenated Organics by 8015 - Quality Control

#### **Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1431023 - Purge and Trap EPA 5030A										
Blank (1431023-BLK1)				Prepared: 0	)1-Aug-14	Analyzed:	04-Aug-14			
Gasoline Range Organics (C6-C10)	ND	5.00	mg/kg							
Duplicate (1431023-DUP1)	Source: P407115-01		Prepared: 0	1-Aug-14	Analyzed: (	04-Aug-14				
Gasoline Range Organics (C6-C10)	ND	5.00	mg/kg		ND				30	
Matrix Spike (1431023-MS1)	Spike (1431023-MS1) Source: P407115-01		Prepared: 0	1-Aug-14	Analyzed: (	04-Aug-14				
Gasoline Range Organics (C6-C10)	0.45		mg/L	0.450	ND	99.8	75-125			



Tulsa OK, 74121-2024

Project Name:

GCU 84E

PO Box 22024

Project Number:

03143-0424

Project Manager:

Jeff Blagg

**Reported:** 05-Aug-14 09:37

#### Nonhalogenated Organics by 8015 - Quality Control

#### **Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1432002 - DRO Extraction EPA 3550M										
Blank (1432002-BLK1)				Prepared &	Analyzed:	04-Aug-14				
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Surrogate: Benzo[a]pyrene	13.6		mg/L	20.0		68.0	50-200			
Matrix Spike (1432002-MS1)	Sou	rce: P408001-	01	Prepared &	Analyzed:	04-Aug-14				
Diesel Range Organics (C10-C28)	625	24.9	mg/kg	499	ND	125	38-132			
Surrogate: Benzo[a]pyrene	21.3		mg/L	20.0		106	50-200			
Matrix Spike Dup (1432002-MSD1)	Sou	rce: P408001-	01	Prepared & Analyzed: 04-Aug-14			ļ			
Diesel Range Organics (C10-C28)	597	25.0	mg/kg	499	ND	120	38-132	4.56	20	
Surrogate: Benzo[a]pyrene	18.6		mg/L	20.0		93.1	50-200			



PO Box 22024

Tulsa OK, 74121-2024

Project Name:

GCU 84E

Project Number:

03143-0424

Project Manager:

Jeff Blagg

**Reported:** 05-Aug-14 09:37

#### Total Petroleum Hydrocarbons by 418.1 - Quality Control

#### **Envirotech Analytical Laboratory**

	Reporting Spike Source			%REC		RPD				
Analyte	Result	Limit Units		Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 1432003 - 418 Freon Extraction										
Blank (1432003-BLK1)				Prepared &	Analyzed:	04-Aug-14	+			
Total Petroleum Hydrocarbons	ND	34.9	mg/kg							
Duplicate (1432003-DUP1)	Source: P408001-01			Prepared &	Analyzed:	04-Aug-14				
Total Petroleum Hydrocarbons	71.9	35.0	mg/kg	71.8				0.251	30	
Matrix Spike (1432003-MSI)	Sour	Prepared &	Analyzed:	04-Aug-14						
Total Petroleum Hydrocarbons	1940	34.9	mg/kg	2020	80-120	·				



PO Box 22024

Tulsa OK, 74121-2024

Project Name:

GCU 84E

Project Number: Project Manager: 03143-0424

Jeff Blagg

Reported:

05-Aug-14 09:37

#### Cation/Anion Analysis - Quality Control

#### **Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1431024 - Anion Extraction EPA 300.0									· · · · · · · · · · · · · · · · · · ·	
Blank (1431024-BLK1)				Prepared &	k Analyzed:	01-Aug-14				
Chloride	ND	9.96	mg/kg							
LCS (1431024-BS1)			Prepared &							
Chloride	509	9.92	mg/kg	496		103	90-110			
Matrix Spike (1431024-MS1)	Sou	rce: P407115-	01	Prepared &	Analyzed:	01-Aug-14				
Chloride	3440	9.84	mg/kg	492	2860	118	80-120			
Matrix Spike Dup (1431024-MSD1)	Sour	rce: P407115-	Prepared &	k Analyzed:	01-Aug-14					
Chloride	3570	9.94	mg/kg	497	2860	142	80-120	3.60	20	SPKI

### CHAIN OF CUSTODY RECORD

17269

Client: BP AMERICA Project Name / Location:								ANALYSIS / PARAMETERS															
BLAGE ENGWEEKI	NG INC.		GCU E	<u> 34E</u>																		—-т	
Email results to Jeffchane	LAUL-CON	4	Sampler Name:						2)	(12	ĺĝ.									ŀ			
Peace. jeffrey @ B	P-COM		J. BLA	66	, <u>"</u>				801	86	826	S			n	١-							
Email results to Jeffc Hage AOL. COM Sampler Name:  Peace Jeff sey @ BP-COM J. BLAGE  Client Phone No.:  Client No.:							ρο	ğ.	рg	leta	ioi		Ŧ	910	1)	ш			l	<u>8</u>	tact		
505-320-1	03143-0424						Meti	Me	Met	8	/ A		with	ple	118.	읦				Ö	e L		
Sample No./ Identification	Sämple Date	Sampl Time	I Lab No.	No./Volume of Containers		Preservative		ve	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE		1		Sample Cool	Sample Intact
95 BGT 5-PEC6	8/1/14	1115	P408001-01	1 × 402					×	×							X	と				V	X
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Relinquished by: (Signature)			C	Date	Time	Recei	ved b	y: (Si	gnatı	ıre)		•								Ī	Date	Tir	ne
Jeff Blagg				2014	1.242			) ) (3.	1	i	-0	2	بر 	X	₩ 	7				8/	1/14	12	148
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Sample Matrix																						$\vdash$	
Soil Solid Sludge Aqueous Other																							
☐ Sample(s) dropped off after					Anal			_					) <u>,</u>								·		
5/95 US Highway 6	54 • Farmingt	on; 14M.8	7401 • 505-632-0615 •	mise 2bu	ngs • 65 M	verca	no 2116	er, 5	uiie i	15, D	uranç	30,: C	U 815	5UI •	labol	ratory	/@en	AILOIE	cn-in	c.con	า		



