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

Liner type: Thickness

Alternative Method:

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.

Pit, Below-Grade Tank, or
12494 Proposed Alternative Method Permit or Closure Plan Application Type of action: Palow grade tank registration Type of action: Palow grade tank registration
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
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.
Operator: BP America Production Company OGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Gallegos Canyon Unit Com A 142E
API Number:3004526125OCD Permit Number:
U/L or Qtr/QtrGSection25Township29NRange12WCounty:San Juan
Center of Proposed Design: Latitude36.69972 Longitude108.04646 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
Temporary: Drilling Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management ☐ Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
☐ String-Reinforced
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
M below-grade tank. Subsection of 17.15.17.11 White
Volume:95.0bbl Type of fluid:Produced water

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

☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off

mil HDPE PVC Other

☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _Single walled/double bottomed

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)	hospital,				
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet					
Alternate. Please specify					
6. Nottings Subsection E of 10.15.17.11 NIMAC (Applies to powe quart pits and powers are top top top top)					
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 acceptance of the compliance of the complianc	otable 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				
<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)	☐ Yes ☐ No				
- Written confirmation or verification from the municipality; Written approval obtained from the municipality					
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 Within a 100-year floodplain. (Does not apply to below grade tanks)					
- FEMA map Rolow Crade Tenks					
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;	☐ Yes ☐ No				
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site					
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								
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	□ Vaa □ Na							
	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							
	L ICS L 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 Naturations: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. 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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.13 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	NMAC 15.17.9 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 doc 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 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:								

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 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 ₂ S, 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	documents are					
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 F 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	luid Management Pit					
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						
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. In 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 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 No NA Yes No					
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells 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 NA						
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa ake (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						
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.						

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 FEMA map	☐ Yes ☐ No ☐ Yes ☐ No								
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plans 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 NMAC 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 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 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	.11 NMAC .15.17.11 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 bel	ief.								
Name (Print):									
Signature: Date:									
e-mail address:Telephone:									
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 128/ Title: Compliance Office OCD Permit Number:	2015								
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 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. Closure Completion Date:7/28/2011									
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.	t complete this								

Form C-144 Oil Conservation Division Page 5 of 6

22.		
Operator Closure Certific	fication:	
	nformation and attachments submitted with this closure report is true, accurate and complete to the best of my know the closure complies with all applicable closure requirements and conditions specified in the approved closure plan-	
Name (Print):Jeff P		
Signature:	Date: _December 23, 2014	
e-mail address:_peace.je	jeffrey@bp.com	

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit Com A 142E API No. 3004526125 Unit Letter G, Section 25, T29N, R12W

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 made due to misunderstanding of the BGT 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 made due to misunderstanding of the BGT 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	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	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

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

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

- 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 covered by the LPT and 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 covered by the LPT and 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 covered by the LPT and 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.

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 Notific	catio	n and Co	orrective A	ction				
					OPERA'	ГOR	[Initi	al Report	\boxtimes	Final Repor
Name of C	ompany: B	Р			Contact: Jef	f Peace					
Address: 20	00 Energy	Court, Farmi	ngton, NM 87401		Telephone No.: 505-326-9479						
Facility Na	Facility Name: Gallegos Canyon Unit Com A 142E					e: Natural gas v	well				
Surface Owner: Private Mineral Owner					Private			API No	. 3004526	125	
			LOCA	ATIO	N OF RE	LEASE					
Unit Letter G	Section 25	Township 29N	Range Feet from the 12W 1,850		n/South Line	Feet from the 1,475	East/W East	est Line	County: S	an Juai	1
		Lati	tude36.69972		Longitud	e 108.04646_					
			NAT	TURE	OF REL	EASE					
Type of Rele						Release: N/A		Volume I	Recovered:	V/A	
		v grade tank –	95 bbl			Hour of Occurrence	ee:	Date and	Hour of Dis	covery	:
Was Immed	iate Notice (Yes No Not R	equired	If YES, To	Whom?					
By Whom?					Date and H	Iour					
Was a Water	Was a Watercourse Reached? ☐ Yes ☒ No				If YES, Vo	olume Impacting t	the Water	course.			
If a Waterco	urse was Im	pacted, Descri	he Fully *								
Tra viacios	arse was in	paeted, Deserr	oo rany.								
			lial Action Taken.* Sampli I, BTEX and chloride belo					removal	to ensure no	soil in	npacts from
			ction Taken.* BGT was re ithin the active well area.	emoved	and the area u	nderneath the BG	T was sai	mpled. T	he area und	er the E	3GT was
regulations a public health should their or the enviro	Il operators or the envir operations h onment. In a	are required to conment. The ave failed to a	ven above is true and comporeport and/or file certain racceptance of a C-141 repodequately investigate and rCD acceptance of a C-141 lations.	release rort by the remedian	notifications and ne NMOCD me te contaminati	nd perform correct arked as "Final Ro on that pose a thre	etive action eport" do eat to gro	ns for rele es not reli und water	eases which ieve the ope r, surface wa	may en rator of iter, hu	ndanger f liability man health
Signature:	all l	2000				OIL CONS	SERVA	ATION	DIVISIO	<u>N</u>	
Printed Nam	e: Jeff Peace				Approved by	Environmental S ₁	pecialist:				
Title: Field I	Environment	al Coordinator			Approval Dat	te:	Ex	xpiration !	Date:		
E-mail Addr	ess: peace.je	ffrey@bp.con	1		Conditions of	Approval:	_		Attached		
Date: Decen	nber 23, 201	4	Phone: 505-326-9479)							

^{*} Attach Additional Sheets If Necessary

CHENT: BP	API#: 3004526125		
CLIENT: DF	P.O. BOX 87, BLO (505) (TANKID -	
	(if applicble):		
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELI	EASE INVESTIGATION / OTHER:	PAGE #:1 of1
	I: SITE NAME: GCU COM		DATE STARTED: 07/18/11
QUAD/UNIT: G SEC: 25 TWP:	29N RNG: 12W PM: N	M CNTY: SJ ST: NM	DATE FINISHED:
	'5'E SW/NE LEASE TYPE: PROD. FORMATION: CHA CONTR		ENVIRONMENTAL SPECIALIST(S): JCB
REFERENCE POINT	_	ORD.: 36.69935 X 108.0466	5 GLELEV: 5.478'
	GPS COORD.: 36.69		BEARING FROM WH.: 150', N22E
		DISTANCE/E	
3)	GPS COORD.:	DISTANCE/	BEARING FROM W.H.:
4)	GPS COORD.:	DISTANCE/E	BEARING FROM W.H.:
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB	USED: HALL	OVM READING
1) SAMPLE ID: 95 BGT 5-pt. @	5' SAMPLE DATE: 07/18/11	SAMPLETIME: 1225 LAB ANALYSIS: 418	.1/8015/8021/300.0 (CI) 0.0
2) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
3) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION	SOIL TYPE: SAND SILTY SAN	D / SILT / SILTY CLAY / CLAY / GRAVEL / C	THER
SOIL COLOR: DARK YEI	LOWISH ORANGE		
COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY/SLIGHTLY MOIST MOIST / MO SAMPLE TYPE: GRAB COMPOSITE # DISCOLORATION/STAINING OBSERVED:	DOSE FIRM / DENSE / VERY DENSE ET / SATURATED / SUPER SATURATED FOR 5	PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC DENSITY (COHESIVE CLAYS & SILTS): SOI HC ODOR DETECTED: YES NO EXF	FT / FIRM / STIFF / VERY STIFF / HARD
ANY AREAS DISPLAYING WETNESS: YES NO ADDITIONAL COMMENTS: NO APPARE	EXPLANATION -	VED FROM BGT. 95 BBL LOW PROFILE	: ABOVE-GRADE TANK TO BE SET
ATOP BGT POSITION.			
SOIL IMPACT DIMENSION ESTIMATION: DEPTH TO GROUNDWATER: _<50' N	NA ft. X NA ft. EAREST WATER SOURCE: <1,000' NE		STIMATION (Cubic Yards) : NA DCD TPH CLOSURE STD: 100 ppm
SITE SKETCH		PLOT PLAN circle: attached 0\	M CALIB. READ. = 53.1 ppm RF = 0.52
		↑ 0\	M CALIB. GAS =
	WOODEN R.W.	N I	ME: 1:15 am(pm) DATE: 07/18/11
		1	MISCELL. NOTES
	PBGTL T.B. ~ 5'	1	wo: N1406352
	RG X	RM I	PO#: 51312
			PK: ZBLACATIMC
SE	PARATOR		
	/ TO WELL		Permit date: 06/14/10
		X - 3.P.D.	A BGT Sidewalls Visible: Y / N / NA
	'ATION DEPRESSION; B.G. = BELOW GRADE; B = E BELOW-GRADE TANK LOCATION; SPD = SAMPLE ;; SW- SINGLE WALL; DW- DOUBLE WALL; SB - SI	POINT DESIGNATION; R.W. = RETAINING WALL;	BGT Sidewalls Visible: Y / N / NA Magnetic declination: 10° E
TRAVEL NOTES: CALLOUT:		ONSITE: 07/18/11	

Hall Environmental Analysis Laboratory, Inc.

Date: 28-Jul-11

CLIENT:

Blagg Engineering

Analytical Report

Lab Order:

Client Sample ID: 95 BGT 5-pt @ -5'

1107821

Collection Date: 7/18/2011 12:25:00 PM

Project:

Analyses

GCU COM A 142E

Date Received: 7/21/2011 Matrix: SOIL

Lab ID: 1107821-01

Result PQL Qual Units DF **Date Analyzed EPA METHOD 8015B: DIESEL RANGE ORGANICS** Analyst: JB Diesel Range Organics (DRO) 10 mg/Kg 1 7/23/2011 6:42:45 PM Surr: DNOP 78.6 %REC 73.4-123 1 7/23/2011 6:42:45 PM

EPA METHOD 8015B: GASOLINE RANGE					Analyst: RAA
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	7/25/2011 4:17:36 PM
Surr: BFB	94.4	75.2-136	%REC	1	7/25/2011 4:17:36 PM
EPA METHOD 8021B: VOLATILES					Analyst: RAA
Benzene	ND	0.047	mg/Kg	1	7/25/2011 4:17:36 PM
Toluene	ND	0.047	mg/Kg	1	7/25/2011 4:17:36 PM
Ethylbenzene	ND	0.047	mg/Kg	1	7/25/2011 4:17:36 PM
Xylenes, Total	ND	0.094	mg/Kg	1	7/25/2011 4:17:36 PM
Surr: 4-Bromofluorobenzene	104	92-130	%REC	1	7/25/2011 4:17:36 PM
EPA METHOD 300.0: ANIONS					Analyst: SRM
Chloride	ND	7.5	mg/Kg	5	7/27/2011 2:06:31 PM
EPA METHOD 418.1: TPH					Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	7/26/2011

Qualifiers:

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

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

Date: 28-Jul-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project: GCU COM A 142E

Work Order:

1107821

									Order.	110/821
Result	Units	PQL	SPK Va S	SPK ref	%Rec L	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual
ions										
	MBLK				Batch ID:	27761	Analysi	s Date:	7/27/2011	1:31:43 PN
ND	mg/Kg	1.5								
	LCS				Batch ID:	27761	Analysi	s Date:	7/27/2011	1:49:08 PN
14.53	mg/Kg	1.5	15	0	96.9	90	110			
Н										
	MBLK				Batch ID:	27741	Analysi	s Date:		7/26/201
ND	mg/Kg	20								
	LCS				Batch ID:	27741	Analysi	s Date:		7/26/201
98.60	mg/Kg	20	100	0	98.6	87.8	115			
	LCSD				Batch ID:	27741	Analysi	s Date:		7/26/2011
94.62	mg/Kg	20	100	0	94.6	87.8	115	4.12	8.04	
esel Range	Organics									
ocor range					Batch ID:	27716	Analysi	s Date:	7/23/2011 10	0:32:01 AM
ND		10					, , , , , ,			
,,,,		10			Batch ID:	27716	Analysi	s Date:	7/23/2011 1	1:06:18 AM
55.36		10	50	0	111	66.7				
		, ,			Batch ID:	27716		s Date:	7/23/2011 11	1:40:56 AN
55.25	mg/Kg	10	50	0	110	66.7	119		18.9	
scolino Par			***				****		70144	
asonne Ran	-				Batch ID:	27714	Analysis	s Date:	7/25/2011 11	1-59-10 PM
ND		5.0			Daton 15.	21114	, maryon	o Dato.	77207201111	1.55.1611
NO		5.0			Batch ID:	27714	Analysis	s Date:	7/25/2011 9	9:35:00 PM
27.35		5.0	25	0					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
							,			
platiles	MDIV				Batch ID:	27744	Analyzie	Date	7/25/2011 11	1.E0.10 DM
NID		0.050			Daton ID.	2//14	Allalysis	b Date.	772572011 11	1.59, TO PIV
	mg/Kg	0.10								
		0.10								
ND					Batch ID:	27714	Analysis	s Date:	7/25/2011 9	0:06:13 PM
	LCS	0.050	1	0	Batch ID:	27714	Analysis	s Date:	7/25/2011 9	9:06:13 PM
0.9121	LCS mg/Kg	0.050	1	0	91.2	83.3	107	s Date:	7/25/2011 9	9:06:13 PM
	LCS	0.050 0.050 0.050	1 1 1	0 0				s Date:	7/25/2011 9):06:13 PM
	ND 14.53 H ND 98.60 94.62 esel Range ND 55.36 55.25	MBLK ND	MBLK ND mg/Kg 1.5 LCS 14.53 mg/Kg 1.5 H MBLK ND mg/Kg 20 LCS 98.60 mg/Kg 20 LCSD 94.62 mg/Kg 20 esel Range Organics MBLK ND mg/Kg 10 LCS 55.36 mg/Kg 10 LCSD 55.25 mg/Kg 10 Asoline Range MBLK ND mg/Kg 5.0 LCS 27.35 mg/Kg 5.0 Dlatiles MBLK ND mg/Kg 0.050 ND mg/Kg 0.050	ions MBLK ND	MBLK ND mg/Kg 1.5 LCS 14.53 mg/Kg 1.5 15 0 H MBLK ND mg/Kg 20 LCS 98.60 mg/Kg 20 100 0 LCSD 94.62 mg/Kg 20 100 0 esel Range Organics MBLK ND mg/Kg 10 LCS 55.36 mg/Kg 10 50 0 LCSD 55.25 mg/Kg 10 50 0 asoline Range MBLK ND mg/Kg 5.0 LCS 27.35 mg/Kg 5.0 25 0 Dlatiles MBLK ND mg/Kg 0.050 ND mg/Kg 0.050 ND mg/Kg 0.050	MBLK	MBLK	MBLK	Result Units PQL SPK va SPK ref %Rec LowLimit HighLimit %RPD	Result Units PQL SPK va SPK ref %Rec LowLimit HighLimit %RPD RPDLimit

0	ua	164	in	

E Estimated value

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

J Analyte detected below quantitation limits

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG			Date Received	1:	7/20/2011
Work Order Number 1107821			Received by	AMG	1 1-16
Checklist completed by:	- 0	7/2c		bels checked by:	Initiats
Matrix:	Carrier name: Gre	yhound			
Shipping container/cooler in good condition?	Yes	V	No 🗌	Not Present	
Custody seals intact on shipping container/cooler?	Yes	/	No 🗌	Not Present	Not Shipped
Custody seals intact on sample bottles?	Yes		No 🗌	N/A	
Chain of custody present?	Yes	V	No 🗌		
Chain of custody signed when relinquished and receive	d? Yes	/	No 🗌		
Chain of custody agrees with sample labels?	Yes	/	No 🗌		
Samples in proper container/bottle?	Yes	~	No 🗌		
Sample containers intact?	Yes	V	No 🗌		
Sufficient sample volume for indicated test?	Yes	V	No 🗌		,
All samples received within holding time?	Yes	Y	No 🗌		Number of preserved
Water - VOA vials have zero headspace? No V	OA vials submitted	/	Yes	No 🗌	bottles checked for pH:
Water - Preservation labels on bottle and cap match?	Yes		No 🗌	N/A	
Water - pH acceptable upon receipt?	Yes		No 🗌	N/A	<2 >12 unless noted
Container/Temp Blank temperature?	1	.3°	<6° C Acceptable	9	below.
COMMENTS:			If given sufficient	time to cool.	
	=====				========
Client contacted Date co	ontacted:		Perso	on contacted	
Contacted by: Regard	ling:				
Comments:		er carbon		1.0 (One) to 10.0	
					T
Corrective Action)-(v4. a)		78.20

Chain-of-Custody Record			Turn-Around	Time:		7															
Client: BLAGG ENGINEERIN INC.						HALL ENVIRONMENTAL ANALYSIS LABORATORY															
			Project Name:			www.hallenvironmental.com															
BP AMERICA Mailing Address: P.O. Box 87		2 07	Gev	Com A 1	42E		404	24.11									400				
		F.O. 8	50× 21	Project #:													M 87				
			field, NM 87413					Te	l. 50	5-34	5-39	1000000	The same of	No. of Concession, Name of Street, or other Designation, Name of Street, or other Designation, Name of Street, or other Designation, Name of Street, Original Property and Name of Stree	ST PULS	CONTRACTOR OF	4107		1250		
Phone #		505-	632-1199	Desired Mana				((A	пату	-	Req	uesi					
email or Fax#:		Project Mana			21)	only	ese					304	S								
QA/QC P			□ Level 4 (Full Validation)		BLALL		(80°	(Gas	(Gas/Diesel)					,PO4,	2 PCB						
Accreditation □ NELAP □ Other			Sampler: 2		<u>∠</u> <u>= </u>	TAB	+ TPH (Gas only)		18.1)	04.1)	AH)		3,NO2	/ 808		(A)				or N)	
□ EDD	(Type)_			Sample Tem	erature:	4	8		180	d 4	bd 5(or P	tals	I,NO	ides	7	.00	DE			2
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	=EALNOLS	BTEX + WIBE + TMB's (8021)	BTEX + MTBE	TPH Method 8015B	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,SO4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	CHEOLOFE			Air Bubbles (Y
lishail	1775	Sall	95 BGT 5-pt @-5	4 02×1	COOL	-1	X		X									X			
10/20h	100)	20.2	3-70 6 3																\top		
			76.4																+	+	_
		-					-							_		_			+	-	+
												_		-				\vdash	-	+	-
								_							_			\square	\dashv	+	_
															_			\square	_	\perp	
						* 10															
Date: 19/20() Date:	Time:	Relinquish	1 Blagg	Received by: Received by:	- Walte	Date Time 7/19/11 / 725 Date Time	Rer	mark				PDE					12		×		
7/19/11	1645 f necessary,	samples subi	usture Wasters mitted to Hall Environmental may be sub	contracted to other a	ccredited laboratori	12011 (000 ed. This serves as notice of thi	_	bility.					_			ated o	n the a	inalytic	al repo	rt.	



