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 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.

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application RECEIVED
Type of action: Below grade tank registration
Operator: BP America Production CompanyOGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Gallegos Canyon Unit 166E
API Number:3004524429OCD Permit Number:
U/L or Qtr/QtrE Section34 Township28N Range12W County:San Juan
Center of Proposed Design: Latitude36.62140 Longitude108.10439 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
Volume:95.0bbl Type of fluid:Produced water
Tank Construction material:Fiber Glass
☐ 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/single bottomed; side walls not visible
Liner type: Thicknessmil
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.

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. 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 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				
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				
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)	☐ Yes ☐ No				
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division					
 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					
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).	☐ Yes ☐ No				
- Topographic map; Visual inspection (certification) of the proposed site					
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							
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).	<u>.</u>						
- 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 Naturations: 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 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC) 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	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 do attached.	cuments are						
 □ 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).15.17.9 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	locuments 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 19.15.17.11 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	
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 Fl Alternative Proposed Closure Method: Waste Excavation and Removal	uid Management Pit
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 a 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
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. P. 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	Yes No
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
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	☐ 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 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								
- FEMA 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 19.15.17.11 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								
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 believed.	ef								
Name (Print): Title:									
Signature: Date:									
e-mail address:	•								
18. OCD Approval: Permit Application (including glosure plan) Closure Plan (only) OCD Conditions (see attachment)									
OCD Approval: Permit Application (including glosure plan) Closure Plan (only) OCD Conditions (see attachment)									
OCD Approval: ☐ Permit Application (including glosure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)									
OCD Approval: Permit Application (including glosure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 2/12	12015 the closure report.								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 2/12 Title: OCD Permit Number: 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 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.	the closure report.								

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 requires	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature:	Date: _February 4, 2015
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 166E API No. 3004524429 Unit Letter E, Section 34, T28N, 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	760
Chlorides	US EPA Method 300.0 or 4500B	250 or background	42

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 and chloride levels were below the stated limits. TPH was 760 ppm by Method 418.1 and 180 ppm by Method 8015B, which are above the standard. 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 a release occurred. The release was addressed through the spill and release guidelines and remediation was completed on October 2, 2014.
- 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 of the adjacent well.
- 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.

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.

			Rel	ease Notific	cation	n and Co	orrective A	ction				
					OPERATOR Initial Report S Fi					Final Repor		
Name of Company: BP						Contact: Jef		·		I		
		Court, Farmi	ngton, N	M 87401		Telephone No.: 505-326-9479						
Facility Name: Gallegos Canyon Unit 166E						Facility Typ	e: Natural gas v	vell				
Surface Ow	ner: Feder	al		Mineral (Owner:	Federal			API No	. 3004524	429	
				LOCA	ATIO	N OF RE	LEASE					
Unit Letter E	Section 34	Township 28N	Range 12W	Feet from the 1,760	North/ North	th/South Line Feet from the East			Vest Line	County: S	San Juar	n
		Lat	itude3	36.6214		_ Longitude	e108.10439					
				NAT	TURE	OF REL	EASE					
Type of Rele							Release: unknow			Recovered:		
Source of Re	elease: belov	v grade tank –	95 bbl			Date and I- unknown	lour of Occurrenc	e:		Hour of Di 12:14 PM	scovery	: December
Was Immedi	ate Notice (Yes 🗵] No □ Not R	equired	If YES, To	Whom?					
By Whom?						Date and I-	lour					
Was a Water	course Read		Yes 🗵] No		If YES, Vo	olume Impacting t	he Wate	rcourse.			
If a Waterco	urse was Im	pacted, Descr	ibe Fully.	*			·					
		,	·									
the BGT. So release occur	oil analysis r red. Analy	esulted in BT sis results are	EX and chattached.	nloride below stan	ndards.	ГРН was 760	the BGT was doi ppm by Method 4	418.1 an	d 180 ppm	by Method	I 8015B	s, indicating a
release occur Final was su	red. Impac bmitted on J	ted soil was ex anuary 6, 201	cavated a	and transported to ecavated area was	a landfa backfill	arm for treatmed and compa	nderneath the BG tent. Remediation acted and is still w	n was convithin the	mpleted or e active we	n October 2 ell area.	, 2014 a	and the C-141
regulations a public health should their or the enviro	Il operators or the envioperations homent. In a	are required to ronment. The ave failed to a	o report ar acceptanced adequately OCD accep	nd/or file certain reports of a C-141 report investigate and reports of the contract of the co	elease nort by the emediate	otifications a e NMOCD m e contaminati	knowledge and und perform correct arked as "Final Room that pose a three the operator of the the operator of the correct arket	tive acti eport" de eat to gr	ons for rel oes not rel ound wate	eases which ieve the ope r, surface w	n may en crator of ater, hu	ndanger f liability man health
OIL CONSERVATION DIVISION												
Signature:	Veff	Vesce	/									
Printed Nam	e: Jeff Peac	e				Approved by Environmental Specialist:						
Title: Field I	Environmen	tal Coordinato	r			Approval Da	te:	E	Expiration	Date:		
E-mail Addr	ess: peace.jo	effrey@bp.com	n			Conditions of Approval:						
Date: Februa	ary 4, 2015		Phone	: 505-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 8741	3	API#: 3004524429
	(505) 632-1199		(if applicble): A
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER: 95 BGT (A) CLOSURE		PAGE#: 1 of 1
SITE INFORMATION	J: SITE NAME: GCU # 166E		DATE STARTED: 12/06/11
QUAD/UNIT: E SEC: 34 TWP:	28N RNG: 12W PM: NM CNTY: SJ ST:	NM	DATE FINISHED:
1/4-1/4/FOOTAGE: 1,760'N / 960	'E SW/NW LEASE TYPE: FEDERAL/ STATE / FEE / INI	DIAN	ENVIRONMENTAL
LEASE #: SF078903A	PROD. FORMATION: MV CONTRACTOR: MBF- C. MCINN	ES	SPECIALIST(S): JCB
REFERENCE POINT	· · · · · · · · · · · · · · · · · · ·		GLELEV: 5.801'
1) (A) 95 BGT (SW/SB)	2C C2440 V 400 40420		RING FROM W.H.: 120', N54E
, ,	GPS COORD.: D	ISTANCE/BEA	RING FROM W.H.:
			RING FROM W.H.:
4)	GPS COORD.: D	ISTANCE/BEA	RING FROM W.H.:
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL		OVM READING
1) SAMPLE ID: 95 BGT_5-pt. @	6' SAMPLE DATE: 12/06/11 SAMPLE TIME: 1214 LAB ANALYSIS	-	TPH/BTEX/CL (ppm) 0.0
. •	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 SAND SILT/SILTY CLAY/CLAY/GRA	AVEL / OTH	HER
SOIL COLOR:			
COHESION (ALL OTHERS): NON COHESIVE SLIGHTL CONSISTENCY (NON COHESIVE SOILS): LO MOISTURE: DRY SLIGHTLY MOIST/MOIST) W SAMPLE TYPE: GRAB (COMPOSITE) - I DISCOLORATION/STAINING OBSERVED	DOSE FIRM / DENSE / VERY DENSE ET / SATURATED / SUPER SATURATED # OF PTS. DENSITY (COHESIVE CLAYS & SIL HC ODOR DETECTED: YES [N	TS): SOFT	OHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC / FIRM / STIFF / VERY STIFF / HARD ANATION -
ANY AREAS DISPLAYING WETNESS: YES / NC ADDITIONAL COMMENTS:			
SOIL IMPACT DIMENSION ESTIMATION DEPTH TO GROUNDWATER: <50'			MATION (Cubic Yards) : NA DIPH CLOSURE STD: 100 ppm
SITE SKETCH	PLOT PLAN circle: attach	OVM	CALIB. READ. = 53.3 ppm RF = 0.52 CALIB. GAS = 100 ppm RF = 0.52 12:20 an(pm) DATE: 12/06/11
	S.P.D. X X X X X X X X X X X X X X X X X X X	1	MISCELL. NOTES 1299520 SCHWLLBGT
⊕ WELL HEAD	ON DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL H		PERMIT DATE: 06/14/10 BGT Sidewalls Visible: Y / N BGT Sidewalls Visible: Y / N
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEI APPLICABLE OR NOT AVAILABLE; SW - SINGL	.OW4GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NC E WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.	- 1	agnetic declination: 10° E
TRAVEL NOTES: CALLOUT	ONSITE: 12/06/11		

Hall Environmental Analysis Laboratory, Inc.

Date: 21-Dec-11 Analytical Report

CLIENT:

Blagg Engineering

Client Sample ID: 95 BGT 5-pt @ 6'

Lab Order:

1112508

Project:

Collection Date: 12/6/2011 12:14:00 PM

Lab ID:

GCU 166E 1112508-01 **Date Received:** 12/9/2011

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANG	E ORGANICS					Analyst: JB
Diesel Range Organics (DRO)	` 180	100		mg/Kg	10	12/19/2011 11:14:50 AM
Surr: DNOP	0	77.4-131	S	%REC	10	12/19/2011 11:14:50 AM
EPA METHOD 8015B: GASOLINE RA	NGE					Analyst: RAA
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	12/16/2011 2:21:33 PM
Surr: BFB	103	69.7-121		%REC	1	12/16/2011 2:21:33 PM
EPA METHOD 8021B: VOLATILES						Analyst: RAA
Benzene	ND	0.049		mg/Kg	1	12/16/2011 2:21:33 PM
Toluene	. ND	0.049		mg/Kg	1	12/16/2011 2:21:33 PM
Ethylbenzene	ND	0.049		mg/Kg	1	12/16/2011 2:21:33 PM
Xylenes, Total	ND	0.099		mg/Kg	1	12/16/2011 2:21:33 PM
Surr: 4-Bromofluorobenzene	106	80-120		%REC	1	12/16/2011 2:21:33 PM
EPA METHOD 300.0: ANIONS						Analyst: BRM
Chloride	42	7.5		mg/Kg	5	12/19/2011 7:42:38 PM
EPA METHOD 418.1: TPH						Analyst: JB
Petroleum Hydrocarbons, TR	760	20		mg/Kg	1	12/15/2011

Qualifiers:

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

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

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

GCU 166E

Work Order:

Date: 21-Dec-11

1112508

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec L	owLimit Hi	ghLimit %RPE	RPDLimit	Qual
Method: EPA Method 300.0: A	nions									
Sample ID: 1112508-01AMSD		MSD				Batch ID:	29780	Analysis Date:	12/19/2011	9:09:40 PN
Chloride	56.88	mg/Kg	7.5	15	42.26	97.5	74.6	118 2.91	20	
Sample ID: MB-29780		MBLK				Batch ID:	29780	Analysis Date:	12/19/2011	7:07:48 PN
Chloride	ND	m g/Kg	1.5							
Sample ID: LCS-29780		LCS				Batch ID:	29780	Analysis Date:	12/19/2011	7:25:13 PN
Chloride	14.23	mg/Kg	1.5	15	0	94.9	90	110		
Sample ID: 1112508-01AMS		MS				Batch ID:	29780	Analysis Date:	12/19/2011	8:52:16 PN
Chloride	58.56	mg/Kg	7.5	15	42.26	109	74.6	118		
Method: EPA Method 418.1: Ti	PH									
Sample ID: MB-29751		MBLK				Batch ID:	29751	Analysis Date:		12/15/201
Petroleum Hydrocarbons, TR	ND	mg/Kg	20							
Sample ID: LCS-29751		LCS				Batch ID:	29751	Analysis Date:		12/15/2011
Petroleum Hydrocarbons, TR	98.96	mg/Kg	20	100	0	99.0	87.8	115		
Sample ID: LCSD-29751		LCSD				Batch ID:	29751	Analysis Date:		12/15/2011
Petroleum Hydrocarbons, TR	101.4	mg/Kg	20	100	0	101	87.8	115 2.44	8.04	
Method: EPA Method 8015B: E	Diesel Range	Organics								
Sample ID: MB-29749		MBLK				Batch ID:	29749	Analysis Date:	12/15/2011	6:06:49 AN
Diesel Range Organics (DRO)	ND	mg/Kg	10							
Sample ID: LCS-29749		LCS				Batch ID:	29749	Analysis Date:	12/15/2011	6:40:42 AN
Diesel Range Organics (DRO)	59.39	mg/Kg	10	50	0	119	62.7	139		
Method: EPA Method 8015B: 0	asoline Rar	nge								
Sample ID: MB-29737		MBLK				Batch ID:	29737	Analysis Date:	12/16/2011 1	2:20:27 PN
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0							
Sample ID: LCS-29737		LCS				Batch ID:	29737	Analysis Date:	12/16/2011 1	1:19:58 AM
Gasoline Range Organics (GRO)	28.64	mg/Kg	5.0	25	2.06	106	86.4	132		

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E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

Date: 21-Dec-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

GCU 166E

Work Order:

1112508

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec L	owLimit Hip	ghLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8021B: \	/olatiles			_					-		
Sample ID: 1112508-01AMSD		MSD				Batch ID:	29737	Analysi	is Date:	12/16/2011	7:23:49 PN
Benzene	0.8653	mg/Kg	0.047	0.942	0	91.9	67.2	113	4.59	14.3	
Toluene	0.8308	mg/Kg	0.047	0.942	0	88.2	62.1	116	5.84	15.9	
Ethylbenzene	0.8798	mg/Kg	0.047	0.942	0	93.4	67.9	127	5.41	14.4	
Xylenes, Total	2.732	mg/Kg	0.094	2.825	0	96.7	60.6	134	5.60	12.6	
Sample ID: MB-29737		MBLK				Batch ID:	29737	Analysi	s Date:	12/16/2011 1:	2:20:27 PM
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: LCS-29737		LCS				Batch ID:	29737	Analysi	s Date:	12/16/2011 1	1:50:10 AN
Benzene	1.048	mg/Kg	0.050	1	0.0038	104	80	120			
Toluene	1.009	mg/Kg	0.050	1	0.0059	100	80	120			
Ethylbenzene	1.070	mg/Kg	0.050	1	0.0085	106	80	120			
Xylenes, Total	3.322	mg/Kg	0.10	3	0	111	80	120		•	
Sample ID: 1112508-01AMS		MS				Batch ID:	29737	Analysi	s Date:	12/16/2011	6:53:39 PN
Benzene	0.9059	mg/Kg	0.048	0.957	0	94.7	67.2	113			
Toluene	8088.0	mg/Kg	0.048	0.957	0	92.0	62.1	116			
Ethylbenzene	0.9287	mg/Kg	0.048	0.957	0	97.1	67.9	127			
Xylenes, Total	2.889	mg/Kg	0.096	2.871	0	101	60.6	134			

Ona	lif	iers:

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG			Date Received	:	12/9/2011
Work Order Number 1112508	Ω_{I}	•	Received by:	LNM	,
Checklist completed by: Signature Chacket	She	12/C	Sample ID lal	bels checked	by: Initials
Matrix:	Carrier name	Courier			
Shipping container/cooler in good condition?		Yes 🗹	No 🗆	Not Present	
Custody seals intact on shipping container/cool	er?	Yes 🗹	No 🗔	Not Present	☐ Not Shipped ☐
Custody seals intact on sample bottles?		Yes 🗌	No 🗌	N/A	
Chain of custody present?		Yes 🗹	No 🗌		
Chain of custody signed when relinquished and	received?	Yes 🗹	No 🗌		
Chain of custody agrees with sample labels?		Yes 🗹	No 🗌		
Samples in proper container/bottle?		Yes 🗹	No 🗌		
Sample containers intact?		Yes 🗹	No 🗌		
Sufficient sample volume for indicated test?		Yes 🗹	No 🗌		
All samples received within holding time?		Yes 🗹	No 🗌		Number of preserve
Water - VOA vials have zero headspace?	No VOA vials subr	mitted 🗹	Yes	No 🗌	bottles checked for pH:
Water - Preservation labels on bottle and cap m	natch?	Yes \square	No 🗆	N/A 🗹	
Water - pH acceptable upon receipt?		Yes 🗌	No 🗌	N/A	
Container/Temp Blank temperature?		3.5°	<6° C Acceptable	,	below.
COMMENTS:			If given sufficient	time to cool.	
		=====	=====	====	
Client contacted	Date contacted:		Perso	n contacted	
Contacted by:	Regarding:				
Comments:					
Corrective Action					

Chain-of-Custody Record Client: BLAGG BUGNEERUG INC. BP AMERICA Mailing Address: P.O. Box 87 BCOMPIEUD NM 97413 Phone #: 505-632-1197		Turn-Around Time:					4	į.·.,	B-	I A I			NI	TC	20	MF	wF	NT	ΔJ			
		Project Name: Project #: Project Manager:				HALL ENVIRONMENTAL ANALYSIS LABORATORY																
						www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109																
						Tel. 505-345-3975 Fax 505-345-4107 Analysis Request																
											, A	naly	/sis	Req	uest			3				
email or Fax#:							Jy)	sel)					04)									
QA/QC Package: Standard			J. BLAGE				s (8021	(Gas o	as/Die					PO ₄ ,S(PCB's							
Accredi	tation			Sampler: J. BLAGE					PH	. B	=	₽.	₽		NO2	8087						1 ₂
□ NEL		☐ Othe	r	On ice	Z.Yes 300	e⊠-No		H	+	50	418	504	PA	က	, O	/ SS		OA)	12			্চ
□ EDD	(Type) _	<u> </u>		Sample Jem	oerature: I	5.5		Ħ		g bd	ğ	ğ	٥	etal	C, C	cide	₹	ا-\	2			Σ) s
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	THEA	LiNo OX	BTEX + MTBE + TME 's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	CHLORODE	# #		Air Bubbles (Y or N)
2/4/200	1714	Sizil	95 BGT 5-P+06	4.241	Cour		\	X								~	~	~	X		+	+
10011	164 (2010	5-2-8-6	102-1	- COL						싁									\dashv	_	+
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· 200	Time	Relinquish	od bye	Received by:		Doto	Time	D				1		\perp	\Box		لے		Ш			
Date: 7/2011	Time:	1-1	14 13699	hunter.	labor to	12/July	1619								0/		<i>900</i>	5/5	i			
Date:	Time:	Relinquish	ed by:	Received by: Date Time				WORFORM: N 1299520 PATKEY: ZSCHWLLBGT														
12/8/11	1420	Chri	stre Walter																			
If	necessary,	samples subr	mitted to Hall Environmental may be sub-	contracted to other a	credited laboratori	es. This serves	as notice of this	possit	bility. /	Any su	b-cont	racted	l data 1	will be	clearly	y nota:	ted on	the a	nalytica	al report		



