

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

APR 10 2015

Form C-141
Revised August 8, 2011

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

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: Gallegos Canyon Unit 218	Facility Type: Natural gas well
Surface Owner: Tribal	Mineral Owner: Federal
API No. 3004511627	

LOCATION OF RELEASE

Unit Letter A	Section 22	Township 28N	Range 12W	Feet from the 830	North/South Line North	Feet from the 865	East/West Line East	County: San Juan
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Latitude 36.65274 Longitude 108.09225

NATURE OF RELEASE



Type of Release: unknown, possibly produced water	Volume of Release: unknown	Volume Recovered: none
Source of Release: below grade tank – 95 bbl, Tank B	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: 3/25/2010; 7:40 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH and BTEX below standards. Chloride was 1,230 ppm by Method 4500B. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. Soil under the BGT showed 1,230 ppm chloride, indicating a possible produced water release. Competent sandstone bedrock was found at 5.5 feet below grade. Due to the sandstone bedrock, depth to groundwater greater than 50 feet and distance to surface water BP is requesting a risk-based closure approval for this site. The area over the BGT has been reclaimed with the rest of the site since the well has been plugged and abandoned.

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

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Jeff Peace	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: 6/23/15	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: April 10, 2015	Phone: 505-326-9479	

* Attach Additional Sheets If Necessary

#NCS 1512855624

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004511627
FIELD REPORT:		PAGE No: 1 of 1
SITE INFORMATION: SITE NAME: GCU # 218 QUAD/UNIT: A SEC: 22 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM QTR-QTR/FOOTAGE: 830'N / 865'E NE/NE LEASE TYPE: [FEDERAL] STATE / FEE / INDIAN LEASE #: NM012200 PROD. FORMATION: DK CONTRACTOR: ELKHORN		DATE STARTED: 03/23/10 DATE FINISHED: ENVIRONMENTAL SPECIALIST: JCB
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.65270 X 108.04288 GL ELEV.: 5,724' 1) 95 BBL BGT (SW/DB) GPS COORD.: 36.65274 X 108.09225 DISTANCE/BEARING FROM WH.: 209', Due E 2) GPS COORD.: DISTANCE/BEARING FROM WH.: 3) GPS COORD.: DISTANCE/BEARING FROM WH.: 4) GPS COORD.: DISTANCE/BEARING FROM WH.: 5) GPS COORD.: DISTANCE/BEARING FROM WH.:		
LAB INFORMATION: CHAIN OF CUSTODY RECORD(S): 5991 1) SAMPLE ID: 95 BGT 5-pt. @ 6' SAMPLE DATE: 03/23/10 SAMPLE TIME: 0740 LAB ANALYSIS: 418.1/8015/8021/4500B (CI) OVM READING: NA 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: 5) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:		
SOIL DESCRIPTION: SOIL TYPE: [SAND] [SILTY SAND] SILT / SILTY CLAY / CLAY / GRAVEL [OTHER] BEDROCK (sandstone) SOIL COLOR: DARK YELLOWISH ORANGE COHESION (ALL OTHERS): [NON COHESIVE] SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): LOOSE [FIRM] DENSE [VERY DENSE] PLASTICITY (CLAYS): [NON PLASTIC] SLIGHTLY PLASTIC [COHESIVE] MEDIUM PLASTIC / HIGHLY PLASTIC DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD MOISTURE: [DRY] SLIGHTLY MOIST [MOIST] WET / SATURATED / SUPER SATURATED DISCOLORATION/STAINING OBSERVED: YES [NO] EXPLANATION - HC ODOR DETECTED: YES [NO] EXPLANATION - ADDITIONAL COMMENTS: NO APPARENT EVIDENCE OF A RELEASE OR WETNESS OBSERVED FROM BGT. SAMPLE TYPE: GRAB [COMPOSITE] # OF PTS. 5		
EXCAVATION DIMENSIONS (if applicable): NA ft. X NA ft. X NA ft. cubic yards excavated (if applicable): NA		
SITE SKETCH WELL HEAD PBGTL		MISCELL. NOTES MAGNETIC DECLINATION @ 10°E PLOT PLAN circle: Attached N ↑
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL. TRAVEL NOTES: CALLOUT: ONSITE: 03/23/10		



EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ -6'	Date Reported:	03-25-10
Laboratory Number:	53450	Date Sampled:	03-23-10
Chain of Custody No:	8911	Date Received:	03-23-10
Sample Matrix:	Soil	Date Extracted:	03-23-10
Preservative:	Cool	Date Analyzed:	03-23-10
Condition:	Intact	Analysis Needed:	TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	13.4	10.7

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: GCU 218

Analyst

Christine M. Walters
Review



EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

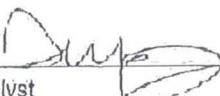
Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ -6'	Date Reported:	03-25-10
Laboratory Number:	53450	Date Sampled:	03-23-10
Chain of Custody No:	8911	Date Received:	03-23-10
Sample Matrix:	Soil	Date Extracted:	03-23-10
Preservative:	Cool	Date Analyzed:	03-24-10
Condition:	Intact	Analysis Requested:	8015 TPH

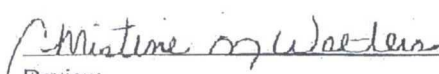
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU 218


Analyst


Review



EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ -6'	Date Reported:	03-25-10
Laboratory Number:	53450	Date Sampled:	03-23-10
Chain of Custody:	8911	Date Received:	03-23-10
Sample Matrix:	Soil	Date Analyzed:	03-24-10
Preservative:	Cool	Date Extracted:	03-23-10
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	ND	1.0
Ethylbenzene	ND	1.0
p,m-Xylene	ND	1.2
o-Xylene	ND	0.9
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	93.0 %
	1,4-difluorobenzene	99.5 %
	Bromochlorobenzene	97.0 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU 218

Analyst

Review



envirotech

Analytical Laboratory

Chloride

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ -6'	Date Reported:	03-25-10
Lab ID#:	53450	Date Sampled:	03-23-10
Sample Matrix:	Soil	Date Received:	03-23-10
Preservative:	Cool	Date Analyzed:	03-24-10
Condition:	Intact	Chain of Custody:	8911

Parameter	Concentration (mg/Kg)
Total Chloride	1,230

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: GCU 218

Analyst

Review



EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	03-23-10
Laboratory Number:	03-23-TPH.QA/QC 53438	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	03-23-10
Preservative:	N/A	Date Extracted:	03-23-10
Condition:	N/A	Analysis Needed:	TPH

Calibration	I-Cal Date	C-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept. Range
	03-04-10	03-23-10	1,680	1,670	0.6%	+/- 10%

Blank Conc. (mg/Kg)	Concentration	Detection Limit
TPH	ND	10.7

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
TPH	18.8	17.4	7.4%	+/- 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
TPH	18.8	2,000	1,680	83.2%	80 - 120%

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: QA/QC for Samples 53438 - 53440 and 53450.

Analyst

Review



EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	03-24-10 QA/QC	Date Reported:	03-25-10
Laboratory Number:	53441	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-24-10
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept. Range
Gasoline Range C5 - C10	05-07-07	9.1398E+002	9.1435E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	8.2750E+002	8.2783E+002	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	ND	250	212	84.8%	75 - 125%
Diesel Range C10 - C28	ND	250	253	101%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for Samples 53441 - 53450

Analyst

Review



EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	03-24-BT QA/QC	Date Reported:	03-25-10
Laboratory Number:	53441	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-24-10
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF	C-Cal RF	%Diff	Blank Conc	Detect Limit
		Accept Range 0 - 15%			
Benzene	1.1445E+006	1.1467E+006	0.2%	ND	0.1
Toluene	1.0503E+006	1.0524E+006	0.2%	ND	0.1
Ethylbenzene	9.5072E+005	9.5263E+005	0.2%	ND	0.1
p,m-Xylene	2.3597E+006	2.3644E+006	0.2%	ND	0.1
o-Xylene	8.9295E+005	8.9474E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff	Accept Range	Detect Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	ND	ND	0.0%	0 - 30%	1.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	ND	ND	0.0%	0 - 30%	0.9


Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	50.0	46.6	93.2%	39 - 150
Toluene	ND	50.0	47.6	95.2%	46 - 148
Ethylbenzene	ND	50.0	46.9	93.8%	32 - 160
p,m-Xylene	ND	100	95.0	95.0%	46 - 148
o-Xylene	ND	50.0	48.1	96.2%	46 - 148

ND - Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 53441 - 53450


Analyst 

Review 

CHAIN OF CUSTODY RECORD

8211

Client: <i>BALU/BA</i>			Project Name / Location: <i>GCU 218</i>			ANALYSIS / PARAMETERS												
Client Address:			Sampler Name: <i>J. BALU</i>															
Client Phone No.:			Client No.: <i>94034-0010</i>															
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	Sample Cool	Sample Intact
<i>95 BOT</i> <i>5-20-0</i>	<i>3/23/10</i>	<i>0740</i>	<i>53450</i>	<i>(S) Sludge</i> <i>Solid Aqueous</i>	<i>1-402</i>		<i>X</i>	<i>X</i>							<i>X</i>	<i>X</i>		<i>yy</i>
				<i>Solid Sludge</i> <i>Solid Aqueous</i>														
				<i>Solid Sludge</i> <i>Solid Aqueous</i>														
				<i>Solid Sludge</i> <i>Solid Aqueous</i>														
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Relinquished by: (Signature) <i>J. H. Blacy</i>					Date <i>3/23/10</i>	Time <i>0838</i>	Received by: (Signature) <i>Brenda J. Tate</i>										Date <i>3/23/10</i>	Time <i>0838</i>
Relinquished by: (Signature)							Received by: (Signature)											
Relinquished by: (Signature)							Received by: (Signature)											



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