

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

AUG 11 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: Steve Moskal
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497
Facility Name: Gallegos Canyon Unit 124	Facility Type: Natural gas well
Surface Owner: Federal	Mineral Owner: Federal
API No. 3004513076	

LOCATION OF RELEASE

Unit Letter D	Section 35	Township 28N	Range 12W	Feet from the 1,190	North/South Line North	Feet from the 1,190	East/West Line West	County: San Juan
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Latitude 36.62269° Longitude -108.08570°

NATURE OF RELEASE


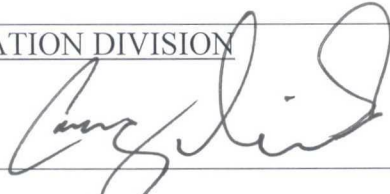
Type of Release: oil/condensate	Volume of Release: unknown	Volume Recovered: none
Source of Release: Below Grade Tank – 95 bbl - Tank A	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: February 3, 2015; 1:20
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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. * Hydrocarbon impacted soil was discovered during the removal of a 95 bbl BGT. A test pit was advanced below the BGT. It was determined the BGT was the source of contamination. The hydrocarbon impacted soil was excavated and transported offsite for disposal.

Describe Area Affected and Cleanup Action Taken.* The area of excavation measured approximately 14' x 15' x 9' deep. Laboratory analysis of the samples collected from the extents of the excavation determined contamination below the soil remediation guidelines based on a site ranking. A total of 20 cubic yards were excavated and transported for offsite disposal. Final reclamation will be completed upon well abandonment activities.

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: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: 8/12/15	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: August 7, 2015	Phone: 505-326-9497	

* Attach Additional Sheets If Necessary

#NCS 1522442640

BP AMERICA PRODUCTION COMPANY

GCU 124 – 95 BBL BGT (TANK ID: A) RELEASE CLEANUP

API #: 30-045-13076

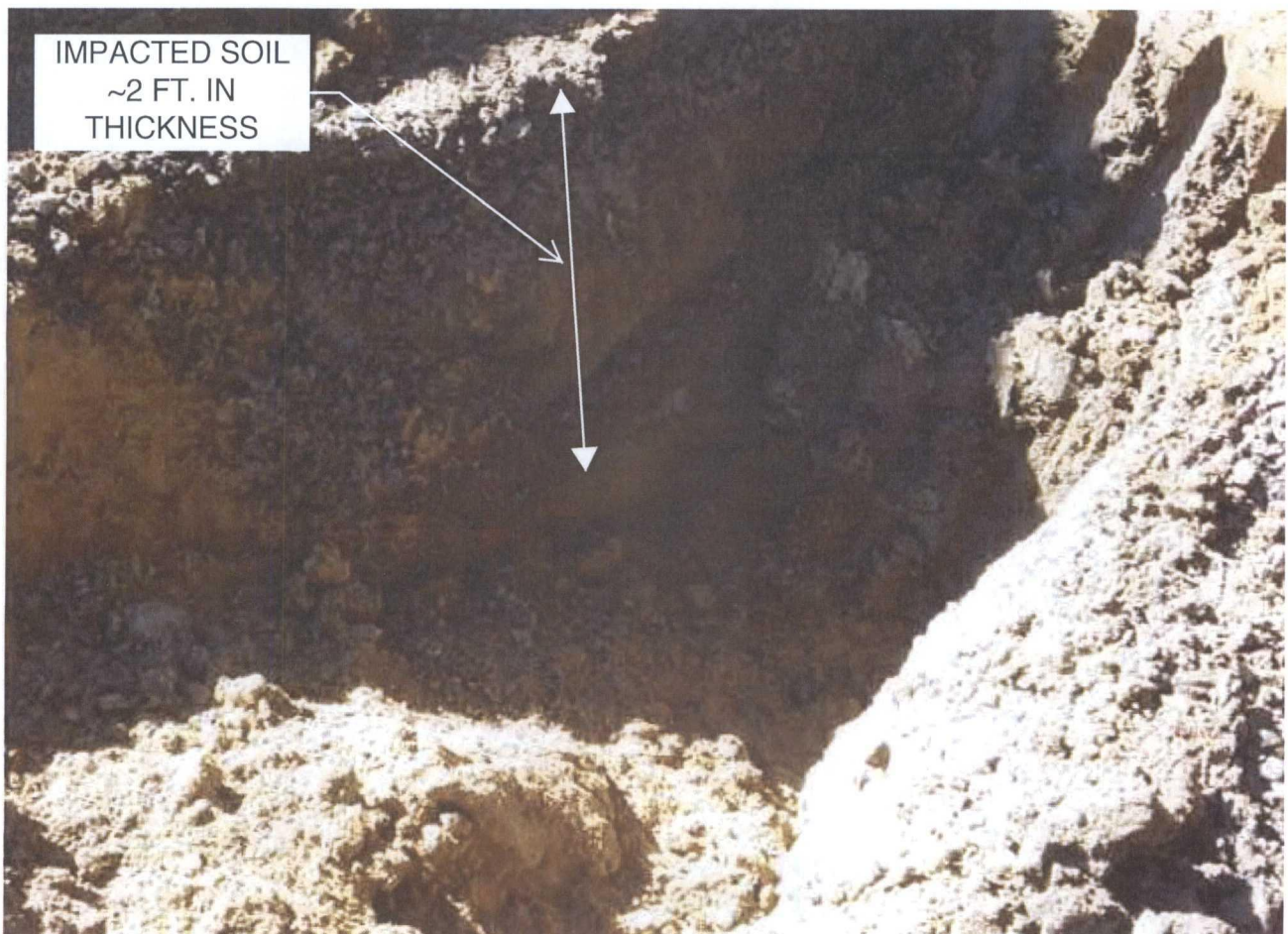
Legal Description: (Unit Letter D, Sec. 35 -T28N -R12W, NMPM)

CHRONOLOGICAL EVENT SUMMATION

1. **February 3, 2015:** BP begins closure of 95 barrel below-grade tank (BGT) at the site. Obvious and apparent soil impacts based on physical odor and distinct visible discoloration were observed directly beneath the BGT after its removal from the subsurface. A five (5) point composite sample (PCS) was collected directly beneath the BGT position at approximately six (6) feet (ft.) below grade (B.G.) [5PC-TB@6'(95)]. A test hole was advanced beneath the center of BGT bottom position to determine the vertical extent of impacts and showed only a thickness of two (2) ft. of similar soil characteristics noted above. Original source appeared to be from the loss integrity of the BGT bottom and possibly from one (1) of two (2) inspection port plugs for the bottom secondary containment compartment.
2. **February 4, 2015:** Preliminary lab results indicated the following results for 5PC-TB@6'(95);
Total Petroleum Hydrocarbons (TPH) using US EPA Method 418.1 = 1,400 mg/Kg
TPH using US EPA Method 8015B = 1,700 mg/Kg
Benzene using US EPA Method 8021B = not detected (ND) at reporting limits of 0.29 mg/Kg
Total benzene, toluene, ethylbenzene, total xylenes (BTEX) using US EPA Method 8021B = 119.1 mg/Kg
Chloride using US EPA Method 300.0 = ND at reporting limits of 30 mg/Kg

Preliminary lab results indicated the following results for TH1@8.5'(95);
TPH using US EPA Method 418.1 = ND at reporting limits of 20 mg/Kg
TPH using US EPA Method 8015B = ND at reporting limits of less than 10 mg/Kg
Benzene using US EPA Method 8021B = ND at reporting limits of 0.037 mg/Kg
BTEX using US EPA Method 8021B = ND at reporting limits of less than 0.073 mg/Kg
Chloride using US EPA Method 300.0 = ND at reporting limits of 30 mg/Kg
3. **February 5, 2015:** A four (4) PCS was collected to confirm the lateral extent of impacts [4PC-SW@6'(95)]. The BP construction crew completed the removal of the obvious and apparent impacted soils. Approximately fifteen (15) cubic yards of soils were excavated beneath the BGT and transported to BP's Crouch Mesa Facility. Excavation dimensions were approximately 14 ft. X 15 ft. X 2 ft. depth.
4. **February 6, 2015:** Preliminary lab results indicated the following results for 4PC-SW@6'(95);
TPH using US EPA Method 418.1 = ND at reporting limits of 20 mg/Kg
Benzene using US EPA Method 8021B = ND at reporting limits of 0.038 mg/Kg
BTEX using US EPA Method 8021B = ND at reporting limits of less than 0.077 mg/Kg
Chloride using US EPA Method 300.0 = ND at reporting limits of 30 mg/Kg

GCU 124 - 95 BGT AREA AFTER REMOVAL

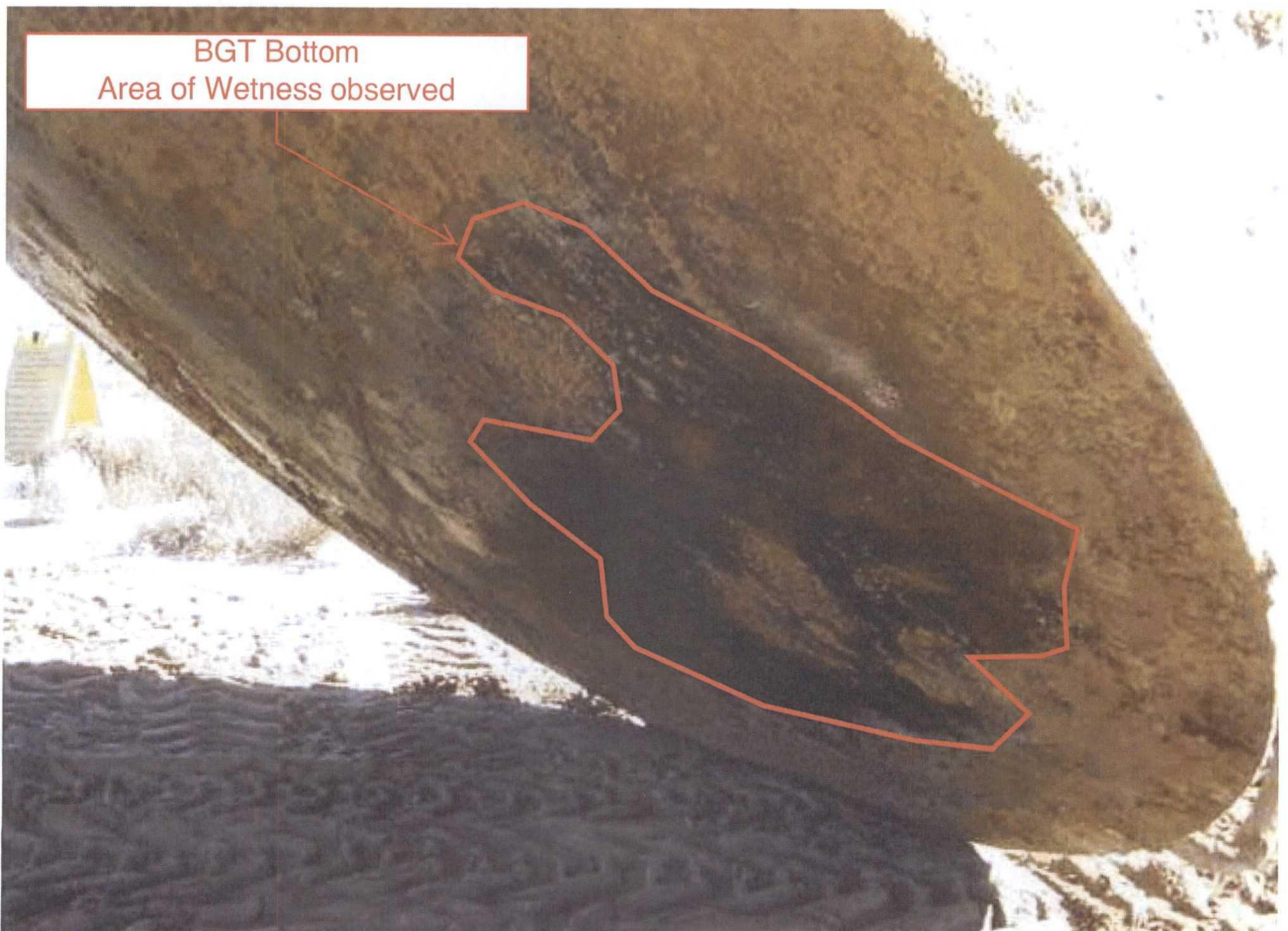


GCU 124 - 95 BGT

Bull Plug - Wetness observed
from exposed threaded portion



BGT Bottom
Area of Wetness observed



CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004513076 TANK ID (if applicable): A												
FIELD REPORT: (circle one): <u>BGT CONFIRMATION</u> / RELEASE INVESTIGATION / OTHER:		PAGE #: 2 of 2												
SITE INFORMATION: SITE NAME: GCU # 124 QUAD/UNIT: D SEC: 35 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM 1/4 -1/4/FOOTAGE: 1,190'N / 1,190'W NW/NW LEASE TYPE: <u>FEDERAL</u> / STATE / FEE / INDIAN LEASE #: SF078903 PROD. FORMATION: DK CONTRACTOR: STRIKE MBF - S. GLYNN		DATE STARTED: 02/05/15 DATE FINISHED: _____ ENVIRONMENTAL SPECIALIST(S): NJV												
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.62271 X 108.08601 GL ELEV.: 5,888' 1) 95 BGT (SW/DB) GPS COORD.: 36.62269 X 108.08570 DISTANCE/BEARING FROM W.H.: 91', S81.5E 2) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____ 3) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____ 4) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____														
SAMPLING DATA: CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL		OVM READING (ppm)												
1) SAMPLE ID: 4PC - SW @ 6' (95) SAMPLE DATE: 02/05/15 SAMPLE TIME: 0815 LAB ANALYSIS: 418.1/8021B/300.0 (CI) 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: _____		NA 												
SOIL DESCRIPTION: SOIL TYPE: <u>SAND</u> / <u>SILTY SAND</u> / SILT / SILTY CLAY / CLAY / GRAVEL / <u>OTHER</u> IMPORTED GRAVEL @ BGT BASE. SOIL COLOR: DARK YELLOWISH ORANGE COHESION (ALL OTHERS): <u>NON COHESIVE</u> / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): LOOSE / <u>FIRM</u> / DENSE / VERY DENSE MOISTURE: DRY / <u>SLIGHTLY MOIST</u> / MOIST / WET / SATURATED / SUPER SATURATED SAMPLE TYPE: GRAB / <u>COMPOSITE</u> - # OF PTS. 4 DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION - SEE PAGE 1 OF 1. PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD HC ODOR DETECTED: <u>YES</u> / NO EXPLANATION - SEE PAGE 1 OF 1. ANY AREAS DISPLAYING WETNESS: <u>YES</u> / NO EXPLANATION - _____														
SITE OBSERVATIONS: LOST INTEGRITY OF EQUIPMENT: <u>YES</u> / NO EXPLANATION - SEE PAGE 1 OF 1. APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: <u>YES</u> / NO EXPLANATION: SEE PAGE 1 OF 1. EQUIPMENT SET OVER RECLAIMED AREA: YES / <u>NO</u> EXPLANATION - _____ OTHER: COLLECTED LATERAL SAMPLES @ IMPACTED DEPTH. ALL IMPACTED ALONG WITH INADVERTANT NON-IMPACTED SOILS MIXED WERE TRANSPORTED TO BP'S CROUCH MESA FACILITY. SOIL IMPACT DIMENSION ESTIMATION: 14 ft. X 15 ft. X 2 ft. EXCAVATION ESTIMATION (Cubic Yards): 15 DEPTH TO GROUNDWATER: <100' NEAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: >1,000' NMOCD TPH CLOSURE STD: 1,000 ppm														
SITE SKETCH BGT Located : off / <u>on</u> site PLOT PLAN circle: <u>attached</u>														
		OVM CALIB. READ. = NA ppm RF=0.52 OVM CALIB. GAS = NA ppm TIME: NA am/pm DATE: NA												
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.		MISCELL. NOTES WO: REF. #: P-12 PK: ZEVH01BGT2 PJ #: Z2-006Q0 Permit date(s): 06/14/10 OCD Appr. date(s): 11/06/14 <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">Tank ID</td> <td style="width:80%;">OVM = Organic Vapor Meter ppm = parts per million</td> <td style="width:10%;"></td> </tr> <tr> <td>A</td> <td>BGT Sidewalls Visible: Y / <u>(N)</u></td> <td></td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> <td></td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> <td></td> </tr> </table> Magnetic declination: 10° E	Tank ID	OVM = Organic Vapor Meter ppm = parts per million		A	BGT Sidewalls Visible: Y / <u>(N)</u>			BGT Sidewalls Visible: Y / N			BGT Sidewalls Visible: Y / N	
Tank ID	OVM = Organic Vapor Meter ppm = parts per million													
A	BGT Sidewalls Visible: Y / <u>(N)</u>													
	BGT Sidewalls Visible: Y / N													
	BGT Sidewalls Visible: Y / N													
NOTES: GOOGLE EARTH IMAGERY DATE: 11/17/2013. ONSITE: 02/03/15, 02/04/15, 02/05/15														

Analytical Report

Lab Order 1502112

Date Reported: 2/5/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: TH1 @ 8.5' (95)

Project: GCU #124

Collection Date: 2/3/2015 1:30:00 PM

Lab ID: 1502112-002

Matrix: SOIL

Received Date: 2/4/2015 8:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: JME
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	2/4/2015 10:00:42 AM	17553
Surr: DNOP	110	63.5-128		%REC	1	2/4/2015 10:00:42 AM	17553
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	3.7		mg/Kg	1	2/4/2015 8:24:13 PM	R24097
Surr: BFB	95.4	80-120		%REC	1	2/4/2015 8:24:13 PM	R24097
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.037		mg/Kg	1	2/4/2015 8:24:13 PM	R24097
Toluene	ND	0.037		mg/Kg	1	2/4/2015 8:24:13 PM	R24097
Ethylbenzene	ND	0.037		mg/Kg	1	2/4/2015 8:24:13 PM	R24097
Xylenes, Total	ND	0.073		mg/Kg	1	2/4/2015 8:24:13 PM	R24097
Surr: 4-Bromofluorobenzene	106	80-120		%REC	1	2/4/2015 8:24:13 PM	R24097
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	ND	30		mg/Kg	20	2/4/2015 12:13:29 PM	17559
EPA METHOD 418.1: TPH							Analyst: JME
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	2/4/2015 12:00:00 PM	17511

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502112

05-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17559	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	17559	RunNo:	24117					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710960	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-17559	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	17559	RunNo:	24117					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710961	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.3	90	110			

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502112

05-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17511	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	17511	RunNo:	24075					
Prep Date:	2/2/2015	Analysis Date:	2/4/2015	SeqNo:	710256	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID	LCS-17511	SampType:	LCS	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS	Batch ID:	17511	RunNo:	24075					
Prep Date:	2/2/2015	Analysis Date:	2/4/2015	SeqNo:	710257	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	97	20	100.0	0	96.6	86.7	126			

Sample ID	LCSD-17511	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID:	17511	RunNo:	24075					
Prep Date:	2/2/2015	Analysis Date:	2/4/2015	SeqNo:	710258	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	99	20	100.0	0	99.3	86.7	126	2.77	20	

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502112

05-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17553	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	17553	RunNo:	24074					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710059	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	12		10.00		116	63.5	128			

Sample ID	MB-17554	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	17554	RunNo:	24073					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710152	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.5		10.00		85.3	63.5	128			

Sample ID	LCS-17554	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	17554	RunNo:	24073					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710153	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.4		5.000		88.1	63.5	128			

Sample ID	LCS-17553	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	17553	RunNo:	24073					
Prep Date:	2/4/2015	Analysis Date:	2/4/2015	SeqNo:	710303	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	56	10	50.00	0	112	67.8	130			
Surr: DNOP	4.9		5.000		97.2	63.5	128			

Sample ID	MB-17578	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	17578	RunNo:	24112					
Prep Date:	2/5/2015	Analysis Date:	2/5/2015	SeqNo:	710887	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	11		10.00		109	63.5	128			

Sample ID	LCS-17578	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	17578	RunNo:	24111					
Prep Date:	2/5/2015	Analysis Date:	2/5/2015	SeqNo:	710956	Units:	%REC			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.5		5.000		89.9	63.5	128			

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502112

05-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	R24097	RunNo:	24097					
Prep Date:		Analysis Date:	2/4/2015	SeqNo:	710491	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	940		1000		94.5	80	120			

Sample ID	2.5UG GRO LCS	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	R24097	RunNo:	24097					
Prep Date:		Analysis Date:	2/4/2015	SeqNo:	710492	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	24	5.0	25.00	0	96.4	64	130			
Surr: BFB	1000		1000		102	80	120			

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502112

05-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	R24097	RunNo:	24097					
Prep Date:		Analysis Date:	2/4/2015	SeqNo:	710517	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		105	80	120			

Sample ID	100NG BTEX LCS	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	R24097	RunNo:	24097					
Prep Date:		Analysis Date:	2/4/2015	SeqNo:	710518	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	107	80	120			
Toluene	1.1	0.050	1.000	0	106	80	120			
Ethylbenzene	1.1	0.050	1.000	0	107	80	120			
Xylenes, Total	3.2	0.10	3.000	0	107	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		113	80	120			

Qualifiers:

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

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

TURN-AROUND TIME:

☐ Standard☒ Rush

**SAME
DAY**

Project Name:

GCU # 124

Project #:

Project Manager:

email or Fax#:

NELSON VELEZ

QA/QC Package:

☒ Standard☐ Level 4 (Full Validation)

Accreditation:

☐ NELAP☐ Other☐ EDD (Type)

Sampler: NELSON VELEZ

On /ce: ☒ Yes

Er No

Sample Temperature:

[illegible]

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

2/3/15 1614

Relinquished by:

[Signature]

Received by:

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

2/3/15 1614

Remarks:

BILL DIRECTLY TO BP:

Jeff Peace, 200 Energy Court, Farmington, NM 87401

Date:	Time:	Relinquished by:
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2/3/15 1747

Relinquished by:

Christa Wiet

Received by:

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

4/15 0830

REF # : P-12 POKKEY: ZEVH018G2

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

Analytical Report

Lab Order 1502258

Date Reported: 2/9/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 4PC-SW @ 6' (95)

Project: GCU #124

Collection Date: 2/5/2015 8:15:00 AM

Lab ID: 1502258-001

Matrix: MEOH (SOIL)

Received Date: 2/6/2015 7:10:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.038		mg/Kg	1	2/6/2015 11:17:56 AM	17580
Toluene	ND	0.038		mg/Kg	1	2/6/2015 11:17:56 AM	17580
Ethylbenzene	ND	0.038		mg/Kg	1	2/6/2015 11:17:56 AM	17580
Xylenes, Total	ND	0.077		mg/Kg	1	2/6/2015 11:17:56 AM	17580
Surr: 4-Bromofluorobenzene	95.1	80-120		%REC	1	2/6/2015 11:17:56 AM	17580
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	ND	30		mg/Kg	20	2/6/2015 11:09:23 AM	17607
EPA METHOD 418.1: TPH							Analyst: JME
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	2/6/2015 12:00:00 PM	17604

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502258

09-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17607	SampType:	MBLK		TestCode:	EPA Method 300.0: Anions				
Client ID:	PBS	Batch ID:	17607		RunNo:	24171				
Prep Date:	2/6/2015	Analysis Date:	2/6/2015		SeqNo:	712654	Units:	mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-17607	SampType: LCS			TestCode: EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID: 17607			RunNo: 24171					
Prep Date:	2/6/2015	Analysis Date: 2/6/2015			SeqNo: 712655		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.6	90	110			

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502258

09-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17604		SampType:	MBLK		TestCode:	EPA Method 418.1: TPH				
Client ID:	PBS		Batch ID:	17604		RunNo:	24139				
Prep Date:	2/6/2015		Analysis Date:	2/6/2015		SeqNo:	711777		Units: mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	ND	20									

Sample ID	LCS-17604		SampType:	LCS		TestCode:	EPA Method 418.1: TPH				
Client ID:	LCSS		Batch ID:	17604		RunNo:	24139				
Prep Date:	2/6/2015		Analysis Date:	2/6/2015		SeqNo:	711778		Units: mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	100	20	100.0	0	102	86.7	126				

Sample ID	LCSD-17604		SampType:	LCSD		TestCode:	EPA Method 418.1: TPH				
Client ID:	LCSS02		Batch ID:	17604		RunNo:	24139				
Prep Date:	2/6/2015		Analysis Date:	2/6/2015		SeqNo:	711779		Units: mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Petroleum Hydrocarbons, TR	97	20	100.0	0	96.9	86.7	126	5.42	20		

Qualifiers:

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

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1502258

09-Feb-15

Client: Blagg Engineering

Project: GCU #124

Sample ID	MB-17580	SampType: MBLK			TestCode: EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID: 17580			RunNo: 24152					
Prep Date:	2/5/2015	Analysis Date: 2/6/2015			SeqNo: 712441		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		104	80	120			

Sample ID	LCS-17580	SampType: LCS			TestCode: EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID: 17580			RunNo: 24152					
Prep Date:	2/5/2015	Analysis Date: 2/6/2015			SeqNo: 712442		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.0	0.050	1.000	0	102	80	120			
Toluene	0.96	0.050	1.000	0	95.7	80	120			
Ethylbenzene	1.0	0.050	1.000	0	101	80	120			
Xylenes, Total	3.1	0.10	3.000	0	102	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		111	80	120			

Qualifiers:

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

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

Sample Log-In Check List

Client Name: **BLAGG**

Work Order Number: **1502258**

RcptNo: **1**

Received by/date:

Logged By: **Lindsay Mangin**

02/06/15
2/6/2015 7:10:00 AM

Completed By: **Lindsay Mangin**

2/6/2015 7:37:16 AM

Reviewed By:

AT 02/06/15

[Signature]

[Signature]

Chain of Custody

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

Log In

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

of preserved
bottles checked
for pH:
(<2 or >12 unless noted)
Adjusted?
Checked by:

Special Handling (if applicable)

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

Person Notified:

Date:

By Whom:

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.6	Good	Yes			

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

Mailing Address: **P.O. BOX 87**
BLOOMFIELD, NM 87413

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

email or Fax#:

QA/QC Package:

☒ Standard ☐ Level 4 (Full Validation)

Accreditation:

☐ NELAP ☐ Other _____

☐ EDD (Type) _____

☐ Standard ☒ Rush **SAME DAY**

Project Name: GCU #124

Project #:	
------------	--

Project Manager:


NELSON VELEZ

Sampler: **NELSON VELEZ** *NV*

On Ice: ☒ Yes ☐ No

Sample Temperature: 140

[illegible]

Date: 2/5/15	Time: 1810	Relinquished by: 
-----------------	---------------	---

Received by: Justin Wark Date 2/5/15 Time 18

Date:	Time:	Relinquished by:
2/5/15	1824	Christ Webb

Received by: [Signature] Date: 02/06/15 Time: 0710



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

✓	BTEX + MTBE + TMB + S (8021B)
	BTEX + MTBE + TPH (Gas only)
	TPH 8015B (GRO / DRO / MTBE)
✓	TPH (Method 418.1)
	EDB (Method 504.1)
	PAH (8310 or 8270SIMS)
	RCRA 8 Metals
	Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)
	8081 Pesticides / 8082 PCB's
	8260B (VOA)
	8270 (Semi-VOA)
✓	Chloride (soil - 300.0 / water - 300.1)
	Grab sample
✓	5 pt. composite sample

Remarks:

BILL DIRECTLY TO BP:

Jeff Peace, 200 Energy Court, Farmington, NM 87401

REF. #: P-12 PAYKEY: ZEV401BGT2

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

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

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

Form C-138
Revised March 12, 2007

*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address: BP America Production Co. * 200 Energy Court * Farmington, NM 87401	
2. Originating Site: Gallegos Canyon Unit 124 - NW/4 Section 35, T28N, R12W Paykey ZEVH01BGT2	
3. Location of Material (Street Address, City, State or ULSTR): Gallegos Canyon Unit 124 - NW/4 Section 35, T28N, R12W or Physical Address: 200 Energy Court, Farmington, NM 87401	
4. Source and Description of Waste: Hydrocarbon impacted soils Estimated Volume <u>50</u> yd ³ / bbls Known Volume (to be entered by the operator at the end of the haul) <u>20</u> yd ³ / bbls	
5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS I, <u>Jeff Peace</u> <i>Jeff Peace</i> , representative or authorized agent for <u>BP America Production Company</u> do hereby Generator Signature certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's 1988 regulatory determination, the above described waste is: (Check the appropriate classification) <input checked="" type="checkbox"/> RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with exempt waste. <u>Operator Use Only: Waste Acceptance Frequency</u> <input checked="" type="checkbox"/> <u>Monthly</u> <input type="checkbox"/> Weekly <input type="checkbox"/> Per Load <input type="checkbox"/> RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous (check the appropriate items) <input type="checkbox"/> MSDS Information <input type="checkbox"/> RCRA Hazardous Waste Analysis <input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Other (Provide description) GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS I, <u>Jeff Peace</u> <i>Jeff Peace</i> , representative for <u>BP America</u> <i>IFI</i> do hereby certify Representative/Agent Signature representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and <u>3</u> samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NM <u>3</u> results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 19.15.36 NMAC.	
6. Transporter: Riley Industrial	

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: JFJ Landfarm) / Industrial Ecosystem, Inc. Permit No. NM 01-0010B

Address of Facility: # 49 CR 3150 Aztec, NM 87410

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☒ Landfarm ☐ Landfill ☐ Other

Waste Acceptance Status:

☒ **APPROVED**

☐ **DENIED** (Must Be Maintained As Permanent Record)

PRINT NAME: H. Selph

TITLE: Clerk

RECEIVED
DATE: 4/5/15

SIGNATURE: H. Selph
Surface Waste Management Facility Authorized Agent

TELEPHON 505-632-1782 FAX NO.: 505-632-1876 or 505-534-1003



CL-2120
PH-7