<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division

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.

Form C-144

Revised June 6, 2013

1220 South St. Francis Dr. Santa Fe, NM 87505

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration
Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration
Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the
environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
I.
Operator: BP America Production Company OGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Gallegos Canyon Unit 316
API Number:3004521865OCD Permit Number:
U/L or Qtr/Qtr I Section 21 Township 28N Range 12W County: San Juan
Center of Proposed Design: Latitude36.64558 Longitude108.11132 NAD: □1927 ⋈ 1983
Surface Owner: Federal State Tribal Trust or Indian Allotment
2.
Drit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling D Workover Approval.
Temporary, Elemany, E
☐ 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: Lx Wx D
3.
Volume:45.0bbl Type of fluid:Produced water
Tank Construction material:Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Double walled/double 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, hospital, institution or church)				
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) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No			
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No			
 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	☐ Yes ☐ No			
Below Grade Tanks				
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)				
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	Yes No				
application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site					
Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Temporary Pit Non-low chloride drilling fluid					
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole,					
or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site					
	Yes No				
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No				
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;					
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No				
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Permanent Pit or Multi-Well Fluid Management Pit					
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa					
lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
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				
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N	MAC				
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc					
attached. 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	NMAC				
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC					
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.	15.17.9 NMAC				
and 19.15.17.13 NMAC					
Previously Approved Design (attach copy of design) API Number: or Permit Number:					
II. Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC					
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc	cuments are				
attached. ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC					
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ A List of wells with approved application for permit to drill associated with the pit.					
Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.	15.17.9 NMAC				
and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC					
☐ Previously Approved Design (attach copy of design) API Number: or Permit Number:					

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC	
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
13. Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fl Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	luid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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 Site Reclamation 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 ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ 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						
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 						
Within a 100-year floodplain FEMA map	☐ Yes ☐ No					
16.						
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, 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 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved) Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC						
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 believes	ief.					
Name (Print):						
Signature: Date:						
e-mail address:						
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	1/_					
OCD Representative Signature: Approval Date: 9/	5/15					
Title: ENU: raw mental Spec OCD Permit Number:						
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.						
Closure Completion Date:2/26/2010						
Closure Method: ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-location and Removal)	oop systems only)					
☐ If different from approved plan, please explain.						

Operator Closure Certification:				
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.				
Name (Print):Jeff Peace	Title: Field Environmental Coordinator			
Signature: Seff Pool	Date:July 7, 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 316
API No. 3004521865
Unit Letter I, Section 21, 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
	45 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	29.4
Chlorides	US EPA Method 300.0 or 4500B	250 or background	100

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

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

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

 Sampling results indicate no release occurred.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

The area under the BGT was backfilled with clean soil and will be reclaimed since the well has been plugged and abandoned.

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 will be reclaimed since the well has been 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 will be reclaimed since the well has been 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 will be reclaimed since the well has been 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 since the well has been plugged and abandoned as part of final reclamation.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation.

 Closure report on C-144 form is included.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action							
		OPERA'	ГOR	Init	ial Report	\boxtimes	Final Report
Name of Company: BP		Contact: Jef	f Peace		-		
Address: 200 Energy Court, Farmington, NM		A	No.: 505-326-94				
Facility Name: Gallegos Canyon Unit 316		Facility Typ	e: Natural gas w	vell			
Surface Owner: Federal	Mineral Owner: I	Federal		API N	o. 30045218	365	
	LOCATION	N OF REI	LEASE				
		South Line	Feet from the 950	East/West Line East	County: S	an Juar	l
Latitude36.6	54558	_ Longitud	e108.11132				
	NATURE	OF REL	EASE				
Type of Release: none		Volume of	Release: N/A	Volume	Recovered: N	J/A	
Source of Release: below grade tank – 45 bbl		Date and H N/A	lour of Occurrence	e: Date and	Hour of Dis	covery	: N/A
Was Immediate Notice Given?	No Not Required	If YES, To	Whom?				
By Whom?		Date and H	lour				
Was a Watercourse Reached? ☐ Yes ☑ No ☐ Yes ☑ No							
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, BTEX and chloride below standards. Analysis results are attached.							
Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. The area under the BGT was backfilled and compacted and will be reclaimed 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: Off Peace			OIL CONS	SERVATION	DIVISIO	<u>N</u>	
Printed Name: Jeff Peace Approved by Environmental Specialist:							
Title: Field Environmental Coordinator	1	Approval Dat	e:	Expiration	Date:		
E-mail Address: peace.jeffrey@bp.com	(Conditions of Approval:					
Date: July 7, 2015 Phone: 505-32	26-9479						

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API#: 3004521865
FIELD REPORT:	BGT CONFIRMATION TEMP. PIT CLOSURE / RELEASE INVESTIGATION (other)	PAGE No:1 of1_
SITE INFORMATION	I: SITE NAME: GCU # 316	DATE STARTED: 02/24/10
QUAD/UNIT: SEC: 21 TW	P: 28N RNG: 12W PM: NM CNTY: SJ ST: NM	DATE FINISHED:
	950' E NE/SE LEASE TYPE: FEDERAL STATE / FEE / II PROD. FORMATION: PC CONTRACTOR: ELKHORN	NDIAN ENVIRONMENTAL SPECIALIST: JCB
	: WELL HEAD (W.H.) GPS COORD.: 36.64549	X 108 11136 GLELEV: 5 608'
	GPS COORD.: 36.64558 X 108.11132	
	GPS COORD.:	
	GPS COORD.:	
	GPS COORD.:	
5)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:
LAB INFORMATION:	CHAIN OF CUSTODY RECORD(S): ENVIROTE	ECH
1) SAMPLE ID: 45 BGT 5 pt. @	6' SAMPLEDATE: 02/24/10 SAMPLETIME: 1238	
	SAMPLE DATE:SAMPLE TIME:	
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 / C	GRAVEL / OTHER
	ELLOWISH ORANGE DISCOLORATION/STAINING	OBSERVED: YES NO EXPLANATION -
COHESION (ALL OTHERS): NON COHESIVE / SLIGHTL' CONSISTENCY (NON COHESIVE SOILS): LC		
PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC /		NO EXPLANATION -
DENSITY (COHESIVE CLAYS & SILTS): SOFT MOISTURE: DRY (SLIGHTLY MOIST) MOIST / WO		OMPOSITE # OF PTS. 5
ADDITIONAL COMMENTS: GAS WE	LL PLUGGED & ABANDONED (P&A).	MPOSITE # OF PIS.
EXCAVATION DIMENSIONS (if applicable	e): NA ft. X NA ft. X NA ft.	cubic yards excavated (if applicable):
SITE SKETCH	/	A PLOT PLAN
0.1.2 0.1.2.1 0.1.		1 sirola: Attached
	FENCE	IN
	BERM	MISCELL. NOTES
	PBGTL	WORK ORDER: N773284
WOODE	T.B. ~ 6' B.G.	LOC: WSL-886627 PAYKEY: ZEGJ01RIGS
R.W.		PAIRE I. ZEGSOTRIGG
		DW - DOUBLE WALLED
		DB - DOUBLE BOTTOM
SEPARATOR ~		SIDEWALLS NOT VISIBLE
P&A	METER RUN	
MARKE	COMPRESSOR	
	X - S	.P.D.
	AVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPRO S BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.T. = RETAININ	
TRAVEL NOTES: CALLOUT	5 BELOWGRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R. I. = RETAINING ONSITE: $02/24/10$	NG VA-IT



EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	45 BGT 5-pt @ 6'	Date Reported:	02-26-10
Laboratory Number:	53242	Date Sampled:	02-24-10
Chain of Custody No:	8812	Date Received:	02-24-10
Sample Matrix:	Soil	Date Extracted:	02-26-10
Preservative:	Cool	Date Analyzed:	02-26-10
Condition:	Intact	Analysis Needed:	TPH-418.1

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

29.4

12.0

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 #316

Analyst

Review



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	45 BGT 5-pt @ 6'	Date Reported:	02-26-10
Laboratory Number:	53242	Date Sampled:	02-24-10
Chain of Custody:	8812	Date Received:	02-24-10
Sample Matrix:	Soil	Date Analyzed:	02-26-10
Preservative:	Cool	Date Extracted:	02-25-10
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
The state of the s	Fluorobenzene	94.0 %
	1,4-difluorobenzene	99.0 %
	Bromochlorobenzene	98.5 %

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 #316

Analyst

Review



Chloride

94034-0010 Project #: Client: Blagg/BP 02-26-10 Date Reported: 45 BGT 5-pt @ 6' Sample ID: 02-24-10 Lab ID#: 53242 Date Sampled: Soil Date Received: 02-24-10 Sample Matrix: Date Analyzed: 02-26-10 Preservative: Cool Condition: Intact Chain of Custody: 8812

Parameter

Concentration (mg/Kg)

Total Chloride

100

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 316

Analyst

Review



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	Blagg/BP	Project #	94034-0010
Sample ID:	45 BGT 5-pt @ 6'	Date Reported	02-26-10
Laboratory Number:	53242	Date Sampled:	02-24-10
Chain of Custody No:	8812	Date Received:	02-24-10
Sample Matrix:	Soil	Date Extracted	02-25-10
Preservative:	Cool	Date Analyzed:	02-26-10
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)	MD	0.1
Total Petroleum Hydrocarbons	MD	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 #316

Analyst

Review

Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 lab@envirotech-inc.com envirotech-inc.com



EPA METHOD 418.1 TOTAL PETROLEUM **HYROCARBONS** QUALITY ASSURANCE REPORT

Client:

QA/QC

Project #:

N/A

Sample ID:

QA/QC

Date Reported.

Laboratory Number:

02-24-TPH.QA/QC 53242

02-26-10 N/A

Sample Matrix:

Freon-113

Date Sampled:

02-26-10

Preservative:

N/A

Date Analyzed: Date Extracted:

02-26-10

Condition:

N/A

Analysis Needed:

TPH

Calibration

I-Cal Date

C-Cal Date I-Cal RF:

C-Cal RF:

% Difference Accept. Range

01-29-10

02-26-10

1.500

1,600

6.7%

+/- 10%

Blank Conc. (mg/Kg) TPH

Concentration

ND

Detection Limit

12.0

Duplicate Conc. (mg/Kg)

TPH

Sample 29.4

Duplicate % Difference Accept. Range

Sample

25.2

14.3%

+/- 30%

Spike Conc. (mg/Kg) TPH

29.4

Spike Added 2,000

Spike Result % Recovery Accept Range 1,740

85.7%

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 Sample 53242.

Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 lab@envirotech-inc.com envirotech-inc.com



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	02-26-BT QA/QC	Date Reported:	02-26-10
Laboratory Number:	53239	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-26-10
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cel RF:	C-Cal RF: Accept Rang	%Diff: re 0 - 15%	Blank Cons	Detect. Limit
Benzene	7 1753E+005	7 1897E+005	0.2%	ND	0.1
Toluene	6.5583E+005	6.5714E+005	0.2%	ND	0.1
Ethylbenzene	5.9502E+005	5.9622E+005	0.2%	ND	0.1
p,m-Xylene	1.4404E+006	1.4433E+006	0.2%	ND	0.1
o-Xylene	5.5876E+005	5:5988E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample Du	plicate	%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 Amo	ount Spiked Spi	ked Sample	% Recovery	Accept Range
Benzene	ND	50.0	49.4	98.8%	39 - 150
Toluene	ND	50.0	48.8	97.6%	46 - 148
Ethylbenzene	ND	50.0	48.9	97.8%	32 - 160
p,m-Xylene	ND	100	98.8	98.8%	46 - 148
o-Xylene	ND	50.0	48.9	97.8%	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 53239 - 53243

Analyst



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

96.0%

101%

Client:	QA/QC		Project #	N/A					
Sample ID:	02-26-10 QA/Q	C	Date Reported:	Date Reported:					
Laboratory Number:	53239		Date Sampled:		N/A				
Sample Matrix:	Methylene Chlori	de	Date Received:		N/A				
Preservative:	N/A		Date Analyzed:		02-26-10				
Condition:	N/A		Analysis Reques	TPH					
	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range				
Gasoline Range C5 - C10	05-07-07	1.0789E+003	1.0794E+003	0.04%	0 - 15%				
Diesel Range C10 - C28	05-07-07	1.1553E+003	1.1558E+003	0.04%	0 - 15%				
Blank Conc. (mg/L - mg/Kg)	The state of the s	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				

ND - Parameter not detected at the stated detection limit.

References:

Gasoline Range C5 - C10

Diesel Range C10 - C28

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

250

250

240

252

SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 53239 - 53243.

ND

ND

Analyst

75 - 125%

75 - 125%

CHAIN OF CUSTODY RECORD

8212

Client			Project Name /						ANALYSIS / PARAMETERS													
Bisang/BP	,		Sampler Name:	316													,					
Client Address:			Sampler Name:						23	(21)	(0)											
			J. B.	466					801	98	826	S			0							
Client Phone No.:			DIETTINO.:						por	ithoc	hod	Aeta	nion		F		F.	Ш			00	itact
			9403	4-0	010				TPH (Method 8015)	BTEX (Method 8021	Met	8	1/A	RCI	TCLP with H/P		TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact
Sample No./	Sample		Lab No.		ample	No./Volume	Preser	vative	H.	EX	00	CRA	atior	<u></u>	5	PAH	H.	일			dwa	dwe
Identification 45 BGT	Date	Time		1	latrix	of Containers	HgCl ₂ H	N	H	m	>	Œ.	Ö	Ä	Ĕ	7	ļ	Ö			Š	Š
5- PE 86	134/10	1238	53242	Solid	Sludge Aqueous	1-402			×	×							X	x			4	9
				Soil Solid	Sludge Aqueous																1	
				Soil Solid	Sludge Aqueous																	
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				Solid	Aqueous																	
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