District I 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

Alternative Method:

State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe
Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration Permit of a pit or proposed alternative method
UN 18 2015 ☐ Closure of a pit, below-grade tank, or proposed alternative method ☐ Modification to an existing permit/or registration
Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP America Production CompanyOGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Gallegos Canyon Unit 192E
API Number:3004525172OCD Permit Number:
U/L or Qtr/QtrA Section30 Township28N Range12W County:San Juan
Center of Proposed Design: Latitude36.63829 Longitude108.14835 NAD: ☐1927 ☒ 1983 Surface
Owner: Federal State Private Tribal Trust or Indian Allotment
2. Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other
☐ String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D
3.
Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
Volume:95.0bbl Type of fluid:Produced water
Tank Construction material: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 _Single walled/single bottomed; side walls not visible
Liner type: Thicknessmil
4.

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

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify	hospital,
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)	
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	
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.	
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 ☐ NA
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	☐ Yes ☐ No
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	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of	
initial application NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the dot attached.	
Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.	
and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	
11. Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC And the following items must be established to the application. Places indicate by a check work in the box, that the do	oumants and
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the do attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC	
 ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC 	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
### Author	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F	luid Managamant Dit
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	Tuid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15. 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. F 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	☐ Yes ☐ No
 Within an unstable area. 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 FEMA map	Yes No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plants of the closure plants of Subsection E of 19.15.17.10 NMAC 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. Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. 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 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
Operator Application Certification: I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beling the complete to the complete to the best of my knowledge and beling the complete to the complete to t	
e-mail address: Date: Telephone:	
18.	
OCD Approval: Permit Application (including closure plan) Cosure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 9/17/ Title: OCD Permit Number:	2015
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:5/1/2015	
20. Closure Method: ───────────────────────────────────	op systems only)
Closure Report Attachment Checklist: _Instructions: Each of the following items must be attached to the closure report. Please incommark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure) Disposal Facility Name and Permit Number Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude 36.63829 Longitude -108.14835 NAD: 1927	

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closur belief. I also certify that the closure complies with all applicable closure requir	e report is true, accurate and complete to the best of my knowledge and ements and conditions specified in the approved closure plan.
Name (Print):Jeff Peace	Title: Field Environmental Coordinator_
Signature: Jeff Peace	Date:June 18, 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 192E
API No. 3004525172
Unit Letter A, Section 30, 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 sent. The work was originally planned to replace the existing BGT with a new BGT, so closure was not planned. Impacted soil was found when the BGT was removed so that area was excavated and backfilled and a new BGT was installed near the previous site. An operating permit for the new BGT has been submitted to NMOCD for approval.
- 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 sent. The work was originally planned to replace the existing BGT with a new BGT, so closure was not planned. Impacted soil was found when the BGT was removed so that area was excavated and backfilled and a new BGT was installed near the previous site. An operating permit for the new BGT has been submitted to NMOCD for approval..

- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
 - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
 - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
 - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
 - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
 - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
 - k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

The BGT was transported to a storage area for sale and re-use.

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

All equipment associated with the BGT has been removed.

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method	Release Verification	Sample
	95 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	46.9
TPH	US EPA Method SW-846 418.1	100	1,580
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents

listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled and BTEX and chloride levels were below the stated limits. TPH was 1,580 ppm by Method 8015D. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. C-141 is attached.
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
 - Sampling results indicate a release occurred. The release was addressed through the spill and release guidelines.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

The area under the BGT was backfilled with clean soil and is still within the active well area.

10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

BP will seed the area when the well is plugged and abandoned as part of final reclamation.

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

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation. Closure report on C-144 form is included.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

<u>District I</u> 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

Revised August 8, 2011

Form C-141

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.

			Rele	ease Notific	eation	and Co	orrective A	ction				
						OPERA	ΓOR		Initia	al Report		Final Report
Name of Co	ompany: B	P				Contact: Jef	f Peace			1		1
		Court, Farmi	ngton, N	M 87401	,	Telephone 1	No.: 505-326-94	79				
Facility Na	me: Galleg	gos Canyon U	Jnit 192E			Facility Typ	e: Natural gas v	vell				
Surface Ow	ner: Triba	1		Mineral C	wner:	Гribal		Al	PI No.	. 3004525	172	
	LOCATION OF RELEASE											
Unit Letter A	Section 30	Township 28N	Range 12W	Feet from the 800	North/ North	South Line	Feet from the 1,110	East/West I East	Line	County: S	an Juan	l
		Lati	tude_3	6.63829		Longitud	e108.14835_					
				NAT	URE	OF REL	EASE					
Type of Rele	ease: oil/con	densate				Volume of	Release: unknow	n Vol	ume R	lecovered: r	none	
Source of Re	elease: belov	w grade tank –	95 bbl				Iour of Occurrenc			Hour of Dis	covery:	April 14,
337 I 1'	-1 NT-1' (O. 0				unknown	XX.11 O	201	5; 1:45	5 PM		
Was Immedi	ate Notice (Yes 🗵	No Not Re	equired	If YES, To	Whom?					
By Whom?						Date and H	Iour					
Was a Water	course Read		Yes 🛛	No		If YES, Vo	olume Impacting t	he Watercour	rse.			
If a Watanaa	T		L - D - 11 - N									
		pacted, Descri										
the BGT. So	il analysis ı	resulted in BT	EX and ch	n Taken.* Samplir alorides below star	ndards.	TPH was 1,5	80 ppm by Metho	od 8015D. Ai	nalysis	s results are	attache	ed.
release had o	ccurred. Th	ne release was	addressed	ten.* BGT was red through the spill d. The excavated	and rele	ase guideline	es. Impacted soil	was excavate	d and	transported	to a lan	ndfarm for
regulations a public health should their of or the environ	Il operators or the envi operations h nment. In a	are required to ronment. The nave failed to a	report an acceptance dequately CD accep	is true and complete of a C-141 report investigate and retained to the control of a C-141 report investigate and retained of a C-141 report investigate and retained of a C-141 report in the control	elease no ort by the emediate	otifications as NMOCD m contaminati	nd perform correct arked as "Final Ro on that pose a thre	tive actions f eport" does n eat to ground	or rele ot relie water,	eases which eve the open surface wa	may en rator of ater, hur	ndanger Tiability man health
	• • •	0					OIL CONS	SERVATI	ION :	DIVISIO)N	
Signature:	off 7	earl										
Printed Name	e: Jeff Peac	e			1	Approved by Environmental Specialist:						
Title: Field E	Environmen	tal Coordinato	r		1	Approval Dat	e:	Expira	ation I	Date:		
E-mail Addre	ess: peace.je	effrey@bp.com	n			Conditions of	Approval:			Attached		
Date: June	18, 2015		Phone: 50	05-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199 API #:	172
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER: PAGE #: 1 of	1
QUAD/UNIT: A SEC: 30 TWP: 1/4 -1/4/FOOTAGE: 800'N / 1,110	I: SITE NAME: GCU # 192E 28N RNG: 12W PM: NM CNTY: SJ ST: NM DATE STARTED: 04/1 DATE FINISHED: PROD. FORMATION: DK CONTRACTOR: MBF - C. PARKS DATE STARTED: 04/1 DATE FINISHED: ENVIRONMENTAL SPECIALIST(S): JC	
2)	WELL HEAD (W.H.) GPS COORD.: 36.63828 X 108.14784 GL ELEV.: 5, GPS COORD.: 36.63829 X 108.14835 DISTANCE/BEARING FROM W.H.: 142', N8 GPS COORD.: DISTANCE/BEARING FROM W.H.: 142', N8	88W
SAMPLE ID: SAMPLE ID:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL @ 6' SAMPLE DATE: 04/14/15 SAMPLE TIME: 1345 LAB ANALYSIS: 8015B/8021B/300.0 (CI) SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: LAB ANALYSIS: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: LAB ANALYSIS:	OVM READING (ppm) 766
SOIL COLOR: DARK YELLOW COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LO MOISTURE: DRY/SLIGHTLYMOIST) MOIST / WE SAMPLE TYPE: GRAB COMPOSITE - # DISCOLORATION/STAINING OBSERVED: YES NO SITE OBSERVATION APPARENT EVIDENCE OF A RELEASE OBSERVEI EQUIPMENT SET OVER RECLAIMED AREA:	COHESIVE / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD HC ODOR DETECTED: YES NO EXPLANATION - DISCOLORED SOILS ONLY. DEFT / SATURATED SUPER SATURATED ANY AREAS DISPLAYING WETNESS: YES / NO EXPLANATION - RUN ON BENEATH IN EXPLANATION - MEDIUM GRAY TO BLACK IMMEDIATELY ABOVE SANDSTONE. DESTINATION - MEDIUM GRAY TO BLACK IMMEDIATELY ABOVE SANDSTONE. DESTINATION - CORROSION THROUGH BGT BOTTOM EXTERIOR. DAND/OR OCCURRED: YES NO EXPLANATION: INTEGRITY AND IMPACTED SOILS.	BGT
OUTE OVETOU	NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): EAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: <1,000' NMOCD TPH CLOSURE STD: 1,00 BGT Located: off on site PLOT PLAN circle: attached OWN CALIB. READ. = 53.1 ppm OWN CALIB. GAS = 100 ppm TIME: 11:30 ampm DATE: 04/	RF =0.52
COMPRESSOR	PUMP JACK WO: REF. #: P - 123 PK: ZEVH01BGT2 PJ #: Z2-006Q0 Permit date(s): 06/03/ OCD Appr. date(s): 11/18/	10 14
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELO	X - S.P.D. ON DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~= APPROX.; W.H. = WELL HEAD; OW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA-NOT WALL; DW- DOUBLE WALL; SB-SINGLE BOTTOM; DB-DOUBLE BOTTOM. ONSITE: 04/14/15	ı

Analytical Report

Lab Order 1504689

Date Reported: 4/17/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 95 BGT Grab @-6'

Project: GCU 192E

Collection Date: 4/14/2015 1:45:00 PM

Lab ID: 1504689-001

Matrix: MEOH (SOIL) Rec

Received Date: 4/16/2015 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE	ORGANICS					Analyst	BCN
Diesel Range Organics (DRO)	1200	100		mg/Kg	10	4/16/2015 10:59:14 AM	18708
Surr: DNOP	0	57.9-140	S	%REC	10	4/16/2015 10:59:14 AM	18708
EPA METHOD 8015D: GASOLINE RAN	GE					Analyst	NSB
Gasoline Range Organics (GRO)	380	170		mg/Kg	50	4/16/2015 12:45:38 PM	18710
Surr: BFB	118	80-120		%REC	50	4/16/2015 12:45:38 PM	18710
EPA METHOD 8021B: VOLATILES						Analyst	NSB
Benzene	ND	0.86		mg/Kg	50	4/16/2015 12:45:38 PM	18710
Toluene	ND	1.7		mg/Kg	50	4/16/2015 12:45:38 PM	18710
Ethylbenzene	1.9	1.7		mg/Kg	50	4/16/2015 12:45:38 PM	18710
Xylenes, Total	45	3.4		mg/Kg	50	4/16/2015 12:45:38 PM	18710
Surr: 4-Bromofluorobenzene	102	80-120		%REC	50	4/16/2015 12:45:38 PM	18710
EPA METHOD 300.0: ANIONS						Analyst	LGT
Chloride	ND	30		mg/Kg	20	4/16/2015 11:22:09 AM	18724

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

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

Page 1 of 5

- P Sample pH Not In Range
- RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1504689

17-Apr-15

Client:

Blagg Engineering

Project:

GCU 192E

Sample ID MB-18724

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 18724

PQL

RunNo: 25587

Prep Date: 4/16/2015 Analysis Date: 4/16/2015

Result

SeqNo: 758048

Units: mg/Kg

HighLimit

%RPD

RPDLimit

Qual

Analyte Chloride

ND 1.5

SampType: LCS

TestCode: EPA Method 300.0: Anions

Client ID: LCSS Batch ID: 18724

RunNo: 25587

Prep Date: 4/16/2015

Sample ID LCS-18724

Result

SeqNo: 758049

Units: mg/Kg

Analyte

Analysis Date: 4/16/2015

RPDLimit %RPD

PQL SPK value SPK Ref Val

%REC 92.3

LowLimit HighLimit

Qual

Chloride

1.5

15.00

SPK value SPK Ref Val %REC LowLimit

110

Qualifiers:

Value exceeds Maximum Contaminant Level.

E Value above quantitation range

Analyte detected below quantitation limits

RSD is greater than RSDlimit 0

R RPD outside accepted recovery limits

Spike Recovery outside accepted recovery limits

Analyte detected in the associated Method Blank

Н Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

P Sample pH Not In Range

Reporting Detection Limit

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1504689

17-Apr-15

Client:

Blagg Engineering

Project:

GCU 192E

Project: GCU I	92E								
Sample ID MB-18708	SampType:	MBLK	Tes	tCode: EF	PA Method	8015D: Diese	el Range (Organics	
Client ID: PBS	Batch ID:	18708	F	RunNo: 2	5548				
Prep Date: 4/15/2015	Analysis Date:	4/16/2015	S	SeqNo: 7	56791	Units: mg/K	(g		
Analyte	Result PC	L SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10							
Surr: DNOP	8.9	10.00		88.9	63.5	128			
Sample ID LCS-18708	SampType:	LCS	Tes	tCode: EF	PA Method	8015D: Diese	el Range (Organics	
Client ID: LCSS	Batch ID:	18708	F	RunNo: 2	5548				
Prep Date: 4/15/2015	Analysis Date:	4/16/2015	S	SeqNo: 7	56805	Units: mg/K	g		
Analyte	Result PC	L SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	10 50.00	0	93.0	67.8	130			
Surr: DNOP	4.7	5.000		93.5	57.9	140			

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 Not In Range
- RL Reporting Detection Limit

Page 3 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1504689

17-Apr-15

Client:

Blagg Engineering

Project:

GCU 192E

Sample ID MB-18710	SampType:	SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range							
Client ID: PBS	Batch ID: 1	8710	F	RunNo: 2	5555				
Prep Date: 4/15/2015	Analysis Date:	4/16/2015	5	SeqNo: 7	57273	Units: mg/k	(g		
Analyte	Result PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND 5.	0							
Surr: BFB	930	1000		93.2	80	120			
Sample ID LCS-18710	SampType: L	.cs	Tes	tCode: El	PA Method	8015D: Gaso	line Rang	e	
Client ID: LCSS	Batch ID: 1	8710	F	RunNo: 2	5555				
Prep Date: 4/15/2015	Analysis Date:	4/16/2015	S	SeqNo: 7	57274	Units: mg/K	(g		
Analyte	Result PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25 5.	25.00	0	100	64	130			
Surr: BFB	960	1000		95.8	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 Not In Range
- RL Reporting Detection Limit

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Hall Environmental Analysis Laboratory, Inc.

WO#:

1504689 17-Apr-15

Client:

Blagg Engineering

Project:

GCU 192E

Sample ID MB-18710	SampT	ype: ME	BLK	Tes	TestCode: EPA Method 8021B: Volatiles									
Client ID: PBS	Batch	n ID: 18	710	F	RunNo: 2									
Prep Date: 4/15/2015	Analysis Date: 4/16/2015		16/2015	SeqNo: 757283			Units: mg/k							
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	0.92		1.000		92.4	80	120							
Sample ID LCS-18710	SampT	ype: LC	S	Tes	tCode: E	tiles								
Client ID: LCSS	Batch	n ID: 18	710	F	RunNo: 2	5555								
Bron Data: AMEIROAE	Doto: AMEIRAGE Analysis Doto: AMEIRAGE						Unito: mar/le	(m						

Client ID: LCSS	Batch	1D: 18	710	R	RunNo: 2	5555							
Prep Date: 4/15/2015	Analysis D	Analysis Date: 4/16/2015			SeqNo: 7	57284	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	109	76.6	128						
Toluene	1.0	0.050	1.000	0	102	75	124						
Ethylbenzene	1.1	0.050	1.000	0	107	79.5	126						
Xylenes, Total	3.2	0.10	3.000	0	106	78.8	124						
Surr: 4-Bromofluorobenzene	1.0		1.000		103	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 Not In Range
- RL Reporting Detection Limit

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Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

Sample Log-In Check List

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com BLAGG Work Order Number: 1504689 RcptNo: 1 Client Name: Received by/date: 4/16/2015 8:00:00 AM Logged By: Ashley Gallegos Completed By: Ashley Gallegos 4/16/2015 9:07:28 AM 04/16/15 Reviewed By: Chain of Custody Yes Not Present 🗸 1. Custody seals intact on sample bottles? No Not Present Yes 🗸 2. Is Chain of Custody complete? 3. How was the sample delivered? Courier Log In NA 🗌 No 🗌 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 🗌 6. Sample(s) in proper container(s)? Yes 🗸 No 🗌 7. Sufficient sample volume for indicated test(s)? Yes V No 🗌 Yes 🗸 8. Are samples (except VOA and ONG) properly preserved? No 🗸 NA 🗌 9. Was preservative added to bottles? Yes ... No 🗌 No VOA Vials Yes 10. VOA vials have zero headspace? 11. Were any sample containers received broken? Yes No V # of preserved bottles checked No 🗌 for pH: 12. Does paperwork match bottle labels? Yes 🗸 (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No _ 13. Are matrices correctly identified on Chain of Custody? Yes 🗸 No 🗌 Yes V 14. Is it clear what analyses were requested? No _ Checked by: Yes 🗸 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) Yes NA V No [16. Was client notified of all discrepancies with this order? Person Notified: Date Via: eMail Phone Fax In Person By Whom: Regarding: Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Chain-of-Custody Record				Turn-Around Time: SAME DAL				HALL ENVIRONMENTAL																
Client:	Olient: BP America				Turn-Around Time: SAME DAL □ Standard Rush							ANALYSIS LABORATORY												
BLA 66			Project Name: GCU 192E Project #:				www.hallenvironmental.com																	
BLAGE Mailing Address: PODS BOX 87 Bloom Field 87413 Phone #: 5053201183							4901 Hawkins NE - Albuquerque, NM 87109																	
							Tel. 505-345-3975 Fax 505-345-4107																	
											A	nal	ysis	Req	uest									
email or Fax#:				Project Manager:				(ylu	30)					(40							T			
⊋A/QC I Stan	Package: dard		□ Level 4 (Full Validation)	J. Blages				TPH (Gas only)	/ DRO / MRO)			SIMS)		,PO4,S(PCB's									
Accreditation □ NELAP □ Other				Sampler: J Blass On Ice: \$1 Yes □ No			S'SWIT	+	RO/DF	418.1)	504.1)	8270	40	O3,NO ₂ ,	s / 8082		(A)	141			or N)			
□ EDD (Type)			Sample Temperature: 110				BE	(G	b pc	od 5	0 or	etals	Ž	side	(A	-\C	310			2				
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL NO.	BTEX MA	BTEX + MTBE	TPH 8015B (GRO	TPH (Method	EDB (Method	PAH's (8310 or	RCRA 8 Metals	Anions (F,CI,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides / 8082 PCB	8260B (VOA)	8270 (Semi-VOA)	CHLORID			Air Bubbles (Y or N)			
14/2015	1345	SOIL	95 136T 0 -6'	402 ×1	care	-001	X		X									X						
Marketing and the second second			-				-												_	_	-			
							-							!					+	+	-			
																- 7								
																			_	_	-			
																			+	+	+			
Date:	Time:	Relinquish	1 Blogg	Received by:	Walk	Date Time 415/15 1641 Date Time	Rer	nark	S:	P	Bici	Bl	2	Je (÷ €	Peac B6	e T 2							
Date:	1754	M	ustulialles	Amaga	Mayos	04/110/1508	DC)		Re	\$ F.	; F	2	12	3						- 100 H			
, It	necessary,	samples sub	mitted to Hall Environmental may be sub-	contracted to other a	ccredited aboratorie	es. This serves as notice of this	s possi	bility.	Any st	ıb-cont	racted	d data	will be	e clear	ly nota	ated or	the a	nalytica	al report					



