

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
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

14209 Proposed Alternative Method Permit or Closure Plan Application

OIL CONS. DIV DIST. 3

MAR 24 2016

- 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.

1.

Operator: BP America Production Company _____ OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: Gallegos Canyon Unit #230E
API Number: 3004526010 OCD Permit Number: _____
U/L or Qtr/Qtr O Section 23 Township 28N Range 12W County: San Juan
Center of Proposed Design: Latitude 36.64318 Longitude -108.07756 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: Thickness _____ mil ☐ 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: 95.0 bbl 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: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

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.

5.

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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

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
☐ NA

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

<p>Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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.</p> <p>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Temporary Pit Non-low chloride drilling fluid</u></p>	
<p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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;</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p>	
<p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>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.</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment 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 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 NMAC
☐ 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 19.15.17.9 NMAC 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

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 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: _____

12.

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 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 H₂S, 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 Fluid Management Pit
☐ 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

14.

Waste Excavation and Removal 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.

- ☐ 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

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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> 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.*

<input type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
<input type="checkbox"/> Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
<input type="checkbox"/> Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
<input type="checkbox"/> Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
<input type="checkbox"/> Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
<input type="checkbox"/> Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
<input type="checkbox"/> Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
<input type="checkbox"/> Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
<input type="checkbox"/> Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
<input type="checkbox"/> Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
<input type="checkbox"/> Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

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 belief.

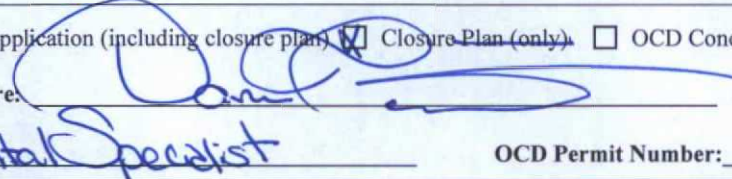
Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.

OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 03/28/2016

Title: Environmental Specialist OCD Permit Number: _____

19.

Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 2/25/2016

20.

Closure Method:

☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)

☐ If different from approved plan, please explain.

21.

Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

<input type="checkbox"/> Proof of Closure Notice (surface owner and division)
<input type="checkbox"/> Proof of Deed Notice (required for on-site closure for private land only)
<input type="checkbox"/> Plot Plan (for on-site closures and temporary pits)
<input checked="" type="checkbox"/> Confirmation Sampling Analytical Results (if applicable)
<input type="checkbox"/> Waste Material Sampling Analytical Results (required for on-site closure)
<input checked="" type="checkbox"/> Disposal Facility Name and Permit Number
<input checked="" type="checkbox"/> Soil Backfilling and Cover Installation
<input type="checkbox"/> Re-vegetation Application Rates and Seeding Technique
<input checked="" type="checkbox"/> Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.64318 Longitude -108.07756 NAD: ☐ 1927 ☒ 1983

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): Steve Moskal Title: Field Environmental Coordinator

Signature:  Date: March 24, 2016

e-mail address: steven.moskal@bp.com Telephone: (505) 326-9497

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit #230E

API No. 3004526010

Unit Letter O, Section 23, 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 approved 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.
Notice was made to the BLM Farmington Field Office via email (attached) as requested by the BLM.
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.
Notice was provided to the NMOCD District III office via email (attached) and the NMOCD witnessed the closure sampling of the BGT.
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 95 bbl BGT Tank A	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.049
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.52
TPH	US EPA Method SW-846 418.1/ <u>8015B</u>	100	<u>2,237</u>
Chlorides	US EPA Method 300.0 or 4500B	250 or background	64

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 for laboratory analysis of BTEX and chloride with results below the stated limits. Sample was analyzed for TPH via 8015 extended range exceeded the stated limits. The area below the BGT is believed to be the location of a former earthen

pit. The earthen pit was remediated via excavation. Sampling and laboratory results are attached. Remedial activities were documented and submitted to the NMOCD on March 14, 2016.

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.
Laboratory results indicate no significant release has occurred from the BGT. However the BGT was located in the area of a historic earthen pit. The earthen pit was remediated via excavation.
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 within the active process area
The BGT was located in the area of a historic earthen pit. The earthen pit was remediated via excavation. The area under the BGT was backfilled with clean soil and has been reclaimed since the well was 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 was backfilled with clean soil. A low profile tank was placed in the location of the BGT.
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 BGT was located in the area of a historic earthen pit. The earthen pit was remediated via excavation. The area over the BGT was backfilled with clean soil. A low profile tank was placed in the location of the BGT.
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 was backfilled with clean soil. A low profile tank was placed in the location of the BGT. The area will be reclaimed once the well is plugged and abandoned.

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.

A low profile tank was placed in the location of the BGT. The area will be reclaimed once the well is plugged and abandoned.

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 re-vegetation.

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

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 230E	Facility Type: Natural gas well

Surface Owner: Federal	Mineral Owner: Federal	API No. 3004526010
------------------------	------------------------	--------------------

LOCATION OF RELEASE

Unit Letter O	Section 23	Township 28N	Range 12W	Feet from the 1,070	North/South Line South	Feet from the 1,630	East/West Line East	County: San Juan
------------------	---------------	-----------------	--------------	------------------------	---------------------------	------------------------	------------------------	------------------

Latitude 36.64318° Longitude -108.07756°

NATURE OF RELEASE

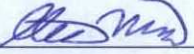
Type of Release: condensate/oil and produced water	Volume of Release: unknown	Volume Recovered: Approx. none
Source of Release: 95 bbl BGT – Tank A	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: 2/12/2016
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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.* Soils below the BGT were sampled during closure activities. NMOCD observed sampling. The BGT appeared to have good integrity and the impacts are likely related to historical releases or the location of a former earthen pit.

Describe Area Affected and Cleanup Action Taken.* The impacted soils were excavated and removed from the site for landfarm treatment. The area of excavation measured approximately 25'x 25'x 11' deep with a total of 180 cubic yards removed from the site. Confirmation closure samples were collected under the observation of the NMOCD with results below the spill and release guidelines. A field report and laboratory reports are attached.

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:	Expiration Date:
E-mail Address: steven.moskal@bp.com		Conditions of Approval:	
Date: March 24, 2016 Phone: 505-326-9497		Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary



BP America Production Company
200 Energy Court
Farmington, NM 87401
Phone: (505) 326-9200

February 4, 2016

Bureau of Land Management
Katherina Diemer
6251 College Suite A
Farmington, NM 87402

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank
Well Name: GCU 230E
API #: 3004526010

Dear Mrs. Diemer,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove two below grade tanks on its well pad located on your surface. BP plans to commence this work on or about February 9, 2016. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required please contact me for a specific time (505)-326-9497.

Sincerely,

Steven Moskal

BP America Production Company

Moskal, Steven

From: Moskal, Steven
Sent: Monday, February 08, 2016 2:13 PM
To: Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us); kdiemer@blm.gov
Cc: jeffcblagg@aol.com; blagg_njv@yahoo.com; mflanike@blm.gov
Subject: RE: BP Pit Close Notification - GCU 230E

All –

The BGT is scheduled to be removed at 8:00AM tomorrow morning.

Thank you,

Steve Moskal

BP Lower 48 – San Juan – Farmington
Field Environmental Coordinator
Office: (505) 326-9497
Cell: (505) 330-9179



From: Railsback, Farrah (CH2M HILL)
Sent: Thursday, February 04, 2016 2:22 PM
To: Smith, Cory, EMNRD; Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)
Cc: jeffcblagg@aol.com; blagg_njv@yahoo.com; Moskal, Steven
Subject: BP Pit Close Notification - GCU 230E

BP America Production Company
200 Energy Court
Farmington, NM 87401
Phone: (505) 326-9200

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US; VANESSA.FIELDS@STATE.NM.US

February 4, 2016

New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

GALLEGOS CANYON UNIT 230E
API 30-045-26010
(O) Section 23 – T28N – R12W
San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close two 95 bbl BGT's that will no longer be operational at this well site. We anticipate this work to start on or around February 9, 2016.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

Steven Moskal
BP Field Environmental Coordinator

(505) 326-9497

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004526010 TANK ID (if applicable): A
FIELD REPORT: (circle one): <u>BGT CONFIRMATION</u> / RELEASE INVESTIGATION / OTHER:		PAGE #: 1 of 1
SITE INFORMATION: SITE NAME: GCU # 230E QUAD/UNIT: O SEC: 23 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM 1/4 - 1/4 FOOTAGE: 1,070'S / 1,630'E SW/SE LEASE TYPE: <u>FEDERAL</u> / STATE / FEE / INDIAN LEASE #: SF078904 PROD. FORMATION: DK/GP CONTRACTOR: MBF - J. POWELL		DATE STARTED: 02/09/16 DATE FINISHED: ENVIRONMENTAL SPECIALIST(S): NJV
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.64349 X 108.07760 GL ELEV.: 5,771' 1) 95 BGT (A) (DW/DB) GPS COORD.: 36.64318 X 108.07756 DISTANCE/BEARING FROM W.H.: 120', S11E 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: 5PC - TB @ 5' (95) - A SAMPLE DATE: 02/09/16 SAMPLE TIME: 1005 LAB ANALYSIS: 8015B/8021B/300.0 (CI) 2) SAMPLE ID: 5PC - TB @ 6'-6.5' (95) - A SAMPLE DATE: 02/12/16 SAMPLE TIME: 1045 LAB ANALYSIS: 8015B/8021B/300.0 (CI) 3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: 4) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:		NA NA
SOIL DESCRIPTION: SOIL TYPE: <u>SAND</u> / <u>SILTY SAND</u> / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER SOIL COLOR: MOSTLY DARK YELLOWISH ORANGE PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC COHESION (ALL OTHERS): <u>NON COHESIVE</u> / <u>SLIGHTLY COHESIVE</u> / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD CONSISTENCY (NON COHESIVE SOILS): <u>LOOSE</u> / <u>FIRM</u> / DENSE / VERY DENSE HC ODOR DETECTED: YES <u>NO</u> EXPLANATION - MOISTURE: DRY / <u>SLIGHTLY MOIST</u> / MOIST / WET / SATURATED / SUPER SATURATED SAMPLE TYPE: GRAB / <u>COMPOSITE</u> - # OF PTS. 5 ANY AREAS DISPLAYING WETNESS: YES <u>NO</u> EXPLANATION - DISCOLORATION/STAINING OBSERVED: YES <u>NO</u> EXPLANATION -		
SITE OBSERVATIONS: LOST INTEGRITY OF EQUIPMENT: YES <u>NO</u> EXPLANATION - APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES <u>NO</u> EXPLANATION: EQUIPMENT SET OVER RECLAIMED AREA: <u>YES</u> / <u>NO</u> EXPLANATION - 105 BBL SHALLOW LOW PROFILE ABOVE-GRADE TANK TO BE SET ATOP BGT POSITION. OTHER:		
SOIL IMPACT DIMENSION ESTIMATION: <u>?</u> ft. X <u>?</u> ft. X <u>?</u> ft. EXCAVATION ESTIMATION (Cubic Yards): <u>?</u> 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 - 273 VID: VHIXONEVB2 PJ #: Permit date(s): 06/15/11 OCD Appr. date(s): 08/09/15 Tank ID: A OVM = Organic Vapor Meter ppm = parts per million BGT Sidewalls Visible: Y / <u>(N)</u> BGT Sidewalls Visible: Y / N BGT Sidewalls Visible: Y / N Magnetic declination: 10° E
NOTES: GOOGLE EARTH IMAGERY DATE: 3/15/2015 ONSITE: 02/09/16		

Hall Environmental Analysis Laboratory, Inc.**Analytical Report**

Lab Order 1602365

Date Reported: 2/11/2016

CLIENT: Blagg Engineering**Client Sample ID:** 5PC-TB @ 5' (95)-A**Project:** GCU #230E**Collection Date:** 2/9/2016 10:05:00 AM**Lab ID:** 1602365-001**Matrix:** SOIL**Received Date:** 2/10/2016 7:40:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	ND	30		mg/Kg	20	2/10/2016 11:15:59 AM	23664
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: KJH
Diesel Range Organics (DRO)	97	9.5		mg/Kg	1	2/10/2016 12:19:25 PM	23655
Motor Oil Range Organics (MRO)	200	48		mg/Kg	1	2/10/2016 12:19:25 PM	23655
Surr: DNOP	96.6	70-130		%Rec	1	2/10/2016 12:19:25 PM	23655
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.2		mg/Kg	1	2/10/2016 9:55:22 AM	A32054
Surr: BFB	94.2	66.2-112		%Rec	1	2/10/2016 9:55:22 AM	A32054
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.042		mg/Kg	1	2/10/2016 9:55:22 AM	B32054
Toluene	ND	0.042		mg/Kg	1	2/10/2016 9:55:22 AM	B32054
Ethylbenzene	ND	0.042		mg/Kg	1	2/10/2016 9:55:22 AM	B32054
Xylenes, Total	ND	0.084		mg/Kg	1	2/10/2016 9:55:22 AM	B32054
Surr: 4-Bromofluorobenzene	115	80-120		%Rec	1	2/10/2016 9:55:22 AM	B32054

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
	D	Sample Diluted Due to Matrix	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	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.**Analytical Report**

Lab Order 1602566

Date Reported: 2/16/2016

CLIENT: Blagg Engineering**Client Sample ID:** 5PC-TB@6'-6.5' (95)-A**Project:** GCU #230E**Collection Date:** 2/12/2016 10:45:00 AM**Lab ID:** 1602566-001**Matrix:** MEOH (SOIL)**Received Date:** 2/13/2016 9:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	64	30		mg/Kg	20	2/15/2016 2:29:38 PM	23726
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: KJH
Diesel Range Organics (DRO)	1300	97		mg/Kg	10	2/15/2016 10:26:46 AM	23717
Motor Oil Range Organics (MRO)	870	480		mg/Kg	10	2/15/2016 10:26:46 AM	23717
Surr: DNOP	0	70-130	S	%Rec	10	2/15/2016 10:26:46 AM	23717
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	67	4.9		mg/Kg	1	2/15/2016 9:51:21 AM	23710
Surr: BFB	698	66.2-112	S	%Rec	1	2/15/2016 9:51:21 AM	23710
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.049		mg/Kg	1	2/15/2016 9:51:21 AM	23710
Toluene	ND	0.049		mg/Kg	1	2/15/2016 9:51:21 AM	23710
Ethylbenzene	ND	0.049		mg/Kg	1	2/15/2016 9:51:21 AM	23710
Xylenes, Total	0.52	0.097		mg/Kg	1	2/15/2016 9:51:21 AM	23710
Surr: 4-Bromofluorobenzene	114	80-120		%Rec	1	2/15/2016 9:51:21 AM	23710

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
	D	Sample Diluted Due to Matrix	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	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602365

11-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23664	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	23664	RunNo:	32050					
Prep Date:	2/10/2016	Analysis Date:	2/10/2016	SeqNo:	980368	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-23664	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	23664	RunNo:	32050					
Prep Date:	2/10/2016	Analysis Date:	2/10/2016	SeqNo:	980369	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	97.2	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602365

11-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23655	SampType:	MBLK		TestCode:	EPA Method 8015M/D: Diesel Range Organics				
Client ID:	PBS	Batch ID:	23655		RunNo:	32031				
Prep Date:	2/10/2016	Analysis Date:	2/10/2016		SeqNo:	979589	Units:	mg/Kg		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	9.2		10.00		91.9	70	130			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602365

11-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	A32054	RunNo:	32054					
Prep Date:		Analysis Date:	2/10/2016	SeqNo:	980098	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	930		1000		93.1	66.2	112			

Sample ID	2.5UG GRO LCS	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	A32054	RunNo:	32054					
Prep Date:		Analysis Date:	2/10/2016	SeqNo:	980099	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	93.5	79.6	122			
Surr: BFB	990		1000		98.7	66.2	112			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602365

11-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	5ML RB	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	B32054	RunNo:	32054					
Prep Date:		Analysis Date:	2/10/2016	SeqNo:	980109	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	1.1		1.000		113	80	120			

Sample ID	100NG BTEX LCS	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	B32054	RunNo:	32054					
Prep Date:		Analysis Date:	2/10/2016	SeqNo:	980110	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	109	80	120			
Ethylbenzene	1.1	0.050	1.000	0	108	80	120			
Xylenes, Total	3.2	0.10	3.000	0	108	80	120			
Surr: 4-Bromofluorobenzene	1.2		1.000		123	80	120			S

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: **BLAGG**

Work Order Number: **1602365**

RcptNo: **1**

Received by/date: AT 02/10/16

Logged By: **Anne Thorne**

2/10/2016 7:40:00 AM

Anne Thorne

Completed By: **Anne Thorne**

2/10/2016

Anne Thorne

Reviewed By: TO

02/10/16

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 $>0^{\circ}\text{C}$ 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 $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602566

16-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23726	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	23726	RunNo:	32168					
Prep Date:	2/15/2016	Analysis Date:	2/15/2016	SeqNo:	983408	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-23726		SampType:	LCS		TestCode:	EPA Method 300.0: Anions				
Client ID:	LCSS		Batch ID:	23726		RunNo:	32168				
Prep Date:	2/15/2016		Analysis Date:	2/15/2016		SeqNo:	983409		Units:	mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Chloride	14	1.5	15.00	0	93.2	90	110				

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602566

16-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23717	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	23717	RunNo:	32137					
Prep Date:	2/15/2016	Analysis Date:	2/15/2016	SeqNo:	982446	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	9.6		10.00		95.6	70	130			

Sample ID	LCS-23717	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	23717	RunNo:	32137					
Prep Date:	2/15/2016	Analysis Date:	2/15/2016	SeqNo:	982447	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	41	10	50.00	0	81.6	65.8	136			
Surr: DNOP	3.9		5.000		78.6	70	130			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602566

16-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23710	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	23710	RunNo:	32139					
Prep Date:	2/12/2016	Analysis Date:	2/15/2016	SeqNo:	982929	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		94.0	66.2	112			

Sample ID	LCS-23710	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	23710	RunNo:	32139					
Prep Date:	2/12/2016	Analysis Date:	2/15/2016	SeqNo:	982930	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	101	79.6	122			
Surr: BFB	1000		1000		100	66.2	112			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
D Sample Diluted Due to Matrix
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
R RPD outside accepted recovery limits
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank
E Value above quantitation range
J Analyte detected below quantitation limits
P Sample pH Not In Range
RL Reporting Detection Limit
W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1602566

16-Feb-16

Client: Blagg Engineering

Project: GCU #230E

Sample ID	MB-23710		SampType:	MBLK		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	PBS		Batch ID:	23710		RunNo:	32139			
Prep Date:	2/12/2016		Analysis Date:	2/15/2016		SeqNo:	982953		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	1.1		1.000		112	80	120			

Sample ID	LCS-23710		SampType:	LCS		TestCode:	EPA Method 8021B: Volatiles			
Client ID:	LCSS		Batch ID:	23710		RunNo:	32139			
Prep Date:	2/12/2016		Analysis Date:	2/15/2016		SeqNo:	982954		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	110	80	120			
Toluene	1.2	0.050	1.000	0	119	80	120			
Ethylbenzene	1.2	0.050	1.000	0	117	80	120			
Xylenes, Total	3.5	0.10	3.000	0	118	80	120			
Surr: 4-Bromofluorobenzene	1.2		1.000		123	80	120			S

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: **BLAGG**

Work Order Number: **1602568**

RcptNo: 1

Received by/date: *LM*

02/13/16

Logged By: **Joe Archuleta**

2/13/2016 9:00:00 AM

Completed By: **Joe Archuleta**

2/13/2016 9:44:02 AM

Reviewed By: *[Signature]*

02/15/16

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 $>0^{\circ}\text{C}$ 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 $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.6	Good	Yes			



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

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

Form C-141
Revised August 8, 2011

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 230E	Facility Type: Natural gas well	
Surface Owner: Federal	Mineral Owner: Federal	API No. 3004526010

LOCATION OF RELEASE

Unit Letter O	Section 23	Township 28N	Range 12W	Feet from the 1,070	North/South Line South	Feet from the 1,630	East/West Line East	County: San Juan
------------------	---------------	-----------------	--------------	------------------------	---------------------------	------------------------	------------------------	------------------

Latitude 36.64318°

Longitude -108.07756°

NATURE OF RELEASE

Type of Release: condensate/oil and produced water	Volume of Release: unknown	Volume Recovered: Approx. none
Source of Release: 95 bbl BGT - Tank A	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: 2/12/2016
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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.* Soils below the BGT were sampled during closure activities. NMOCD observed sampling. The BGT appeared to have good integrity and the impacts are likely related to historical releases or the location of a former earthen pit.

Describe Area Affected and Cleanup Action Taken.* The impacted soils were excavated and removed from the site for landfarm treatment. The area of excavation measured approximately 25'x 25'x 11' deep with a total of 180 cubic yards removed from the site. Confirmation closure samples were collected under the observation of the NMOCD with results below the spill and release guidelines. A field report and laboratory reports are attached.

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.

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:		
Printed Name: Steve Moskal			
Title: Field Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: steven.moskal@bp.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: March 14, 2016	Phone: 505-326-9497		

* Attach Additional Sheets If Necessary

BP America: GCU 230E
(O) Sec 23 – T28N – R12W
San Juan County, New Mexico
API: 30-045-26010

Summary Record of Impact Remediation

February 12, 2016 Initial sampling of 95 BGT for permanent closure. No visual staining or other indication that the BGT had any prior release or integrity issues. Sampling witnessed by NMOCD.

February 13, 2016 Receipt of rush laboratory test reports. BGT failed on TPH only (at 2,237 mg/Kg, primarily diesel and motor oil range organics). Failed lab results reported to NMOCD.

Site NMOCD/BLM closure standard determined at 100 ppm TPH based on:

Horizontal Distance to Dry Wash < 1,000 feet (10 points)

Nearest Water Well > 1,000 feet (0 points)

Depth to Groundwater < 100 feet (10 points)

February 16, 2016 Begin investigation of impact area using backhoe. Test holes dug to approximately 11' deep in center and at perimeter edges of prior BGT location. Soft sandstone encountered at approximately 5' – 6' below grade. Base samples collected from each test hole, and composite sidewall samples collected from perimeter edge test holes for laboratory testing.

February 17, 2016 Receive rush lab results. All passed except south sidewall composite.

February 18, 2016 Hydrovac along Enterprise sales line on south side of impact area to allow excavation closer to that line. No evidence of hydrocarbon impacts along or below Enterprise line.

February 24, 2016 Excavate source area to approximately 25' x 25' x 11' deep using trackhoe. Remove all impacted soils on south sidewall, with final excavation about 4' – 5' north of Enterprise line. Sample south sidewall for closure, witnessed by NMOCD

February 25, 2016 Receive rush lab results from prior days sampling. Samples pass.

Sample ID	Date/Time	Field OVM	TPH 8015B (DRO+GRO+MRO)	BTEX 8021	Chloride	Comments
TH-1 @ 11' (@BGT location)	2/16/2016 @ 12:36	2.3 ppm	ND	ND	ND	Passed
TH-2 @ 11' (North Base)	2/16/2016 @ 12:23	1.3 ppm	ND	ND	38 mg/Kg	Passed
TH-2 @ (6'8"9.5') (North Sidewall)	2/16/2016 @ 10:04	1.3 ppm	ND	ND	NA	Passed
TH-3 @ 11' (West Base)	2/16/2016 @ 12:12	1.1 ppm	ND	ND	35 mg/Kg	Passed
TH-3 @ (6'8"11') (West Sidewall)	2/16/2016 @ 12:12	29.9 ppm	ND	ND	NA	Passed

TH-4 @ 11.5' (South Base)	2/16/2016 @ 13:13	1.8 ppm	ND	ND	ND	Passed
TH-4 @ (6'8'10') (South Sidewall)	2/16/2016 @ 13:06	2,504 ppm	1,920 mg/Kg	0.71 mg/Kg	NA	Failed & subsequently excavated.
TH-5 @ 11.5' (East Base)	2/16/2016 @ 13:41	0.7 ppm	ND	ND	ND	Passed
TH-5 @ (6'8'10') (East Sidewall)	2/16/2016 @ 13:37	2.0 ppm	ND	ND	NA	Passed
South Wall 3-pt (6'-8'-11')	2/24/2016 @ 14:37	0.5 ppm	ND	ND	ND	Passed
NMOCD/BLM	Closure Standard:	NA	100 mg/Kg	50 mg/Kg	100 mg/Kg	

February 26, 2016 Complete backfilling operations. Total volume transported to JFJ Crouch Mesa Landfarm = 180 cubic yards (Form C-138 Attached).

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

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

Form C-138
Revised August 1, 2011

*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 Ct. Farmington, NM 87401

2. Originating Site:

Gallegos Canyon Unit 230E
Paykey: VHIXONEVRM

3. Location of Material (Street Address, City, State or ULSTR):

QRT/QRT: SW/SE Unit: O Section: 23 T28N R12W

4. Source and Description of Waste: Excavated hydrocarbon impacted soil/hydroexcavated impacted soil

Estimated Volume 100/30 yd³ / bbls Known Volume (to be entered by the operator at the end of the haul) 2/24/16-120 cy (100) yd³ bbls

5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I, Steve Moskal, representative or authorized agent for BP America Production Company do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. Operator Use Only: Waste Acceptance Frequency: ☒ Monthly ☐ Weekly ☐ Per Load

☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☒ Process Knowledge ☐ Other (Provide description in Box 4)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

Steve Moskal, representative for BP America Production Company authorize IBI to complete the required testing/sign the Generator Waste Testing Certification.

I, [Signature], representative for IBI do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

5. Transporter:

~~Strike~~ Crossfire

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: #: Industrial Ecosystems Inc., JFJ Waste Management Facility (JFJ), Permit 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: Tamera Beery

TITLE: Clerk

DATE: 2-24-16

SIGNATURE: [Signature]

Surface Waste Management Facility Authorized Agent

TELEPHONE NO.: 505-632-1782

2/18/16