

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

☒ Subsequent Report ☐ Final Report

Name of Company: BP America	Contact: Steve Moskal	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497	
Facility Name: Gallegos Canyon Unit 155	Facility Type: Natural gas well	
Surface Owner: Tribal	Mineral Owner: Federal	API No. 3004507269

LOCATION OF RELEASE

Unit Letter N	Section 23	Township 28N	Range 13W	Feet from the 990	North/South Line South	Feet from the 1,700	East/West Line West	County: San Juan
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Latitude 36.64323° Longitude -108.19174°

NATURE OF RELEASE

Type of Release: produced water	Volume of Release: 7.0 bbl	Volume Recovered: none
Source of Release: Suspected integrity failure of below ground tank	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: September 19, 2016; 8:00 AM
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:	OIL CONS. DIV DIST. 3
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
AUG 16 2017		

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* During a well swabbing job it was noted a decrease in the level of the below grade tank. The level of the BGT was then closely monitored. It was noted that the level of the BGT had definitively dropped when returning to the site on 9/19/16. Review of the well file indicates a release dated November 27, 2013 may have not been addressed. Off site access to the location has not been successfully obtained from the surface user/landowner. Attached are the email correspondences where the BLM indicated they would provide assistance with the access with no success. Further, the BIA has been contacted to assist with no response.

Describe Area Affected and Cleanup Action Taken.* The fluid was removed from the tank. The tank will be removed and sampled for BTEX, TPH via 8015 and chlorides and submitted following the spill and release guidelines. Remediation proposed to be performed via soil shredding o March 29, 2017 has not been executed due to land access obtainment. BP request additional time to obtain access.

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: *Steve Moskal*

Printed Name: Steve Moskal

Title: Field Environmental Coordinator

E-mail Address: steven.moskal@bp.com

Date: July 17, 2017

Phone: 505-326-9497

Approved by Environmental Specialist: *[Signature]*

Approval Date: 8/17/17

Expiration Date:

Conditions of Approval:

Attached ☒

Remediation must start

*By October 1, 2017 or
BP must Submit Additional
Documents Showing Continued
Effort to grant Access.*

* Attach Additional Sheets If Necessary

#NCS 1634053119

(B)

Smith, Cory, EMNRD

From: Smith, Cory, EMNRD
Sent: Thursday, August 17, 2017 8:20 AM
To: Moskal, Steven
Cc: bertha.spencer@bia.gov; l1thomas@blm.gov; 'Gould, Cassandra'; Mora, Roland; Fields, Vanessa, EMNRD
Subject: RE: Gallegos Canyon Unit 155

Steve,

OCD has received BP updated C-141 on 8/16/17 for the Gallegos Canyon Unit 155. BP request for additional time to start remediation has been approved with the following conditions of approval:

- BP must start remediation no later than October 1, 2017.
- If BP must request additional time, please submit an additional C-141 prior to the new remediation deadline with documents showing continued effort to gain offsite access.

If you have additional questions please give me a call.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Gould, Cassandra [mailto:cassandra.gould@bia.gov]
Sent: Tuesday, July 25, 2017 9:37 AM
To: Mora, Roland <Roland.Mora@bp.com>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; bertha.spencer@bia.gov; l1thomas@blm.gov; Moskal, Steven <Steven.Moskal@bp.com>
Subject: Re: Gallegos Canyon Unit 155

Morning Roland,

Point of Contact for NAPI realty is Nate Begay, Technical Services Manager, he would have access to the NAPI maps and boundary lines and his department takes care of realty within NAPI/NIIP. His number is 505-566-2608 and email is nbegay@navajopride.com

Cassandra Gould
Realty Specialist
Bureau of Indian Affairs
Federal Indian Minerals Office
6251 College Blvd, Ste B
Farmington, NM 87402
Direct:(505) 564-7642

Moskal, Steven

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Friday, July 14, 2017 7:55 AM
To: Moskal, Steven; 'l1thomas@blm.gov'; bertha.spencer@bia.gov
Cc: jeffcblagg@aol.com; Hixon, Vance E
Subject: RE: Gallegos Canyon Unit 155

Follow Up Flag: Follow up
Flag Status: Flagged

Steve,

Please attached the Certified letters/ Emails that BP has sent to the Land Owner(s) requesting access to the site so we can note down that BP has diligently tried to gain access to start remediation.

Preferable this request would be best sent on a C-141 update, that way I can file it online and provide updated Conditions of Approval.

Thank you,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Moskal, Steven [<mailto:Steven.Moskal@bp.com>]
Sent: Thursday, July 13, 2017 8:45 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; 'l1thomas@blm.gov' <l1thomas@blm.gov>; bertha.spencer@bia.gov
Cc: jeffcblagg@aol.com; Hixon, Vance E <Vance.Hixon@bp.com>
Subject: RE: Gallegos Canyon Unit 155

Cory,

As discussed yesterday, the deadline set in the conditions of approval was 90 days form the approval date of April 12, 2017 expired on July 12, 2017. BP has not successfully obtained lease access to the location to perform delineation and/or remedial activities. The off lease access requires and executed archeological survey and surface owner agreement.

It is my understanding the BLM worked with the BIA to initiate/complete an arch survey that has since not been approved. I have not had any success in identifying who is responsible for endorsing the survey and providing access.

BP request that the NMOCD extends the deadline until access can be obtained.

Steve Moskal
BP Lower 48 – San Juan

✓ **Field Environmental Coordinator**

Phone: (505) 330-9179



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From: Moskal, Steven

Sent: Wednesday, June 07, 2017 2:46 PM

To: Smith, Cory, EMNRD; 'l1thomas@blm.gov'; bertha.spencer@bia.gov

Cc: jeffcblagg@aol.com; Hixon, Vance E

Subject: Gallegos Canyon Unit 155

Cory, Whitney and Bertha

BP has reported impacts to be known at the subject location. However, BP has been unsuccessful in obtaining approval for offsite access. Per the NMOCD conditions of approval of the remediation plan submitted on March 29, 2017, approved on April 12, 2017, remediation must start within 90 days, July 12, 2017.

Please let me know if there are options for moving forward.

Thank you,

Steve Moskal

BP Lower 48 – San Juan – Farmington

Field Environmental Coordinator

Office: (505) 326-9497

Cell: (505) 330-9179



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Moskal, Steven

From: Thomas, Leigh <l1thomas@blm.gov>
Sent: Monday, March 13, 2017 12:27 PM
To: Moskal, Steven
Subject: Re: Gallegos Canyon Unit 155 Remediation Notification

I still need to make some contacts I was not successful on Friday, I am hopeful I will be able to get a hold of the folks I need to this afternoon.

On Mon, Mar 13, 2017 at 9:54 AM, Moskal, Steven <Steven.Moskal@bp.com> wrote:

How's this looking for clearance?

Steve Moskal

BP Lower 48 – San Juan – Farmington

Field Environmental Coordinator

Office: (505) 326-9497

Cell: (505) 330-9179



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From: Thomas, Leigh [mailto:l1thomas@blm.gov]
Sent: Friday, March 10, 2017 8:44 AM
To: Moskal, Steven
Subject: Re: Gallegos Canyon Unit 155 Remediation Notification

I retract that last statement.

On Fri, Mar 10, 2017 at 8:30 AM, Thomas, Leigh <llthomas@blm.gov> wrote:

Steve,

I have this as private, I will look into it a little further.

Whitney

On Fri, Mar 10, 2017 at 8:21 AM, Moskal, Steven <Steven.Moskal@bp.com> wrote:

Whitney, Cory, Vanessa and Steve,

The GCU 155 is located on Bureau of Indian Affairs managed land. The site has experienced two releases in recent years with no remedial actions. If possible, we will plan to mobilize to the location late next week with work beginning early the week of 3/20/17. This will be based on approval and cultural clearances.

Soil shredding will be used on location. I will have a remediation plan and/or sundry to each of you early next week. The site info is as follows:

GPS: 36.64357° N, 108.19180° W

API: 30-045-07269

Legal Description: Unit N- Section 23- T28N- R13W

Federal Lease #:SF-077966

It appears the well was drilled in 1964.

Steve Moskal

BP Lower 48 – San Juan – Farmington

Field Environmental Coordinator

Office: (505) 326-9497

Cell: (505) 330-9179



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Whitney Thomas

Natural Resource Specialist

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Office: 505-564-7680

Cell: 505-635-9796

email: l1thomas@blm.gov

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