

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
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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:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

OIL CONS. DIV DIST. 3


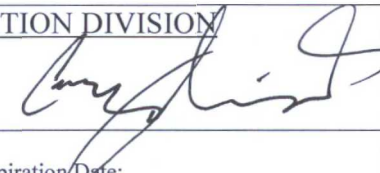
SEP 12 2017

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. Offsite 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 on March 29, 2017 has not been executed due to land access obtainment. BP has elected to plug and abandon the production well prior to beginning remediation at the site. Due to hardship as a results of recent hurricanes in the southeast US, approval of the P&A has been difficult. BP request an additional 30 days to initiate the remediation at the site.

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: 9/19/17	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval:	Attached <input checked="" type="checkbox"/>
Date: September 12, 2017	Phone: 505-326-9497	

* Attach Additional Sheets If Necessary

Additional 30 Day granted
Nov 1st, 2017.

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Smith, Cory, EMNRD

From: Smith, Cory, EMNRD
Sent: Tuesday, September 19, 2017 2:03 PM
To: 'Moskal, Steven'; Thomas, Leigh; bertha.spencer@bia.gov
Cc: Mora, Roland; Beebe, Sabre
Subject: RE: Remediation Project - GCU 155

Steve,

OCD has approved BP request for an additional 30 days for start of remediation following P&A activities.

The new deadline is November 1, 2017.

If you have any additional question 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: Moskal, Steven [<mailto:Steven.Moskal@bp.com>]
Sent: Tuesday, September 12, 2017 7:42 AM
To: Thomas, Leigh <l1thomas@blm.gov>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; bertha.spencer@bia.gov
Cc: Mora, Roland <Roland.Mora@bp.com>; Beebe, Sabre <Sabre.Beebe@bp.com>
Subject: RE: Remediation Project - GCU 155

Whitney and Bertha,

BP has elected to P&A the production well prior to performing remediation at the site. Due to the recent hurricanes in the SE, obtaining approval from headquarters and partners has been delayed. We anticipate beginning remediation the second or third week of October.

Can you provide a status update of the offsite cultural clearance? If so, please provide a boundary or figure for reference.

Thank you,

Steve Moskal
BP Lower 48 – San Juan
Field Environmental Coordinator
Phone: (505) 330-9179



Moskal, Steven

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
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

Follow Up Flag: Follow up
Flag Status: Flagged

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
Main: (505) 564-7640
Fax: (505) 564-7790
cassandra.gould@bia.gov

On Mon, Jul 24, 2017 at 10:17 AM, Mora, Roland <Roland.Mora@bp.com> wrote:

I am looking into whether or not the GCU 155 is located within the boundaries of the Navajo Indian Irrigation Project (NIIP). Looking at an aerial of the GCU 155 there does not appear to be any large scale irrigation taking place adjacent to the location but I will confirm the ownership. Though NIIP may manage the surface, the area of concern is located on land owned by the Navajo Nation.

Thanks,

Roland

From: Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]
Sent: Monday, July 24, 2017 8:35 AM
To: Mora, Roland; bertha.spencer@bia.gov; l1thomas@blm.gov; cassandra.gould@bia.gov
Cc: Moskal, Steven

Subject: RE: Gallegos Canyon Unit 155

Roland,

Only thing I am waiting on is documents/letters from BP to the surface owner trying to get offsite access to finish the remediation. The reasoning behind this is that OCD put a time requirement to start remediation.

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: Mora, Roland (Mankin Land) [<mailto:Roland.Mora@bp.com>]

Sent: Tuesday, July 18, 2017 1:48 PM

To: bertha.spencer@bia.gov; l1thomas@blm.gov; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; cassandra.gould@bia.gov

Cc: Moskal, Steven <Steven.Moskal@bp.com>

Subject: RE: Gallegos Canyon Unit 155

Good afternoon. I am working with Steve Moskal to obtain off-site access for the required remediation work on the Subject well. I believe the off-site access requires and executed archeological survey and surface owner agreement or approved permit/grant. This process seems to have stalled and we would like to get the ball rolling in order to rectify this matter.

Bertha, Cassandra and Whitney—

Can each of you tell what is required from your agency in order to get this process going? Has an arch survey been approved for this off-pad work? What, if any, agreement is required with your agency for this off-pad work?

Cory—

Are you waiting on anything from BP?

I look forward to hearing from you.

Thank you,

Roland

From: Smith, Cory, EMNRD [<mailto: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

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 from 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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