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.

Form C-144 Revised April 3, 2017 low-grade tanks, and

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.

Proposed Alternative Method Permit or Closure Plan Application

Santa Fe, NM 87505

Proposed Afternative Method Perinit of Closure Plan Application
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP America Production Company OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: ATLANTIC LS 002R
API Number: 3004523984 30-045-29384 OCD Permit Number:
U/L or Qtr/Qtr G Section 24 Township 31N Range 10W County: San Juan
Center of Proposed Design: Latitude 36.886966 Longitude -107.832073 NAD83
Surface Owner: Federal State Private Tribal Trust or Indian Allotment
Pit: Subsection F, G or J of 19.15.17.11 NMAC NOV 0 1 2017 Temporary: Drilling Workover Drilling Workover Drilling Workover Drilling Workover Drilling Workover Drilling Workover Drilling 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. TANKA
■ Below-grade tank: Subsection I of 19.15.17.11 NMAC TANK A
Volume: 95 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 Single wall/ Double bottom; sidewalls not visible
Liner type: Thickness mil
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

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)										
Screen Netting Other										
☐ Monthly inspections (If netting or screening is not physically feasible)										
Signs: Subsection C of 19.15.17.11 NMAC 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers Signed in compliance with 19.15.16.8 NMAC										
**Seriances 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: \[\begin{array}{cccccccccccccccccccccccccccccccccccc										
9. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC <u>Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below.</u> Siting criteria does not apply to drying pads or above-grade tanks.	ptable source									
General siting										
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA									
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells										
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No									
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No									
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No									
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No									
Below Grade Tanks										
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No									
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No									
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)										
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No									
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No									
 Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 										
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300 feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No									

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Temporary Pit Non-low chloride drilling fluid									
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No								
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Permanent Pit or Multi-Well Fluid Management Pit									
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No								
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No								
10. Temporary Pits Emergency Pits and Relow-grade Tanks Permit Application Attachment Checklist: Subsection R of 19 15 17 9 N	MAC								
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									
Previously Approved Design (attach copy of design) API Number: or Permit Number:									
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number:									

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, the	at 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 H ₂ S, Prevention Plan	
☐ Emergency Response Plan ☐ Oil Field Waste Stream Characterization	
 ☐ Monitoring and Inspection Plan ☐ Erosion Control Plan ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC 	
13.	
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-v	vell Fluid Management Pit
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 mu	est 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 NMA☐ 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 N	
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	IVIAC
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	
provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalent 19.15.17.10 NMAC for guidance.	icy. Please refer to
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or play lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	ra ☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existe at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	ence Yes No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	
Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17. Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address:	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date:	312017
Title: Lowinsman & Decalist OCD Permit Number:	
Title: Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date: 9/6/2017	
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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	complete this

22.	
Operator Closure Certification:	
	nitted with this closure report is true, accurate and complete to the best of my knowledge and blicable closure requirements and conditions specified in the approved closure plan.
Name (Print): Erin Garifalos	Title: Field Environmental Coordinator
Signature: Utin garifialos	Date: October 30, 2017
e-mail address: erin.garifalos@bp.com	Telephone: (832) 609-7048

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

ATLANTIC LS 002R

API No. 3004523984

Unit Letter G Section 24 T 31N R 10W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.

Notice is attached.

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 and is attached.

- 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 for recycling.

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method	Release Verification	Sample
	95 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	10	< 0.014
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.057
TPH	US EPA Method SW-846 418.1 or 8015 extended	100	<49
Chlorides	US EPA Method 300.0 or 4500B	620	<30

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 chloride, TPH and BTEX with all concentrations below the stated limits. The field report and laboratory reports are attached.

7. BP shall notify the division District III office of its results on form C-141. **C-141** is attached.

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results indicate a release has not occurred. Attached is a laboratory report and C-141.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

Sampling results indicate a release has not occurred. Attached is a laboratory report and field report.

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 has been backfilled and a 105 BBL shallow low profile above-ground tank set atop the BGT location. The area will be reclaimed when the well is plugged and abandoned.

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

The area has been backfilled and a 105 BBL shallow low profile above-ground tank set atop the BGT location. The area will be reclaimed when the well is plugged and abandoned.

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 has been backfilled and a 105 BBL shallow low profile above-ground tank set atop the BGT location. The area will be reclaimed when 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.

The area has been backfilled and a 105 BBL shallow low profile above-ground tank set atop the BGT location. The area will be reclaimed when 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 revegetation.

The area has been backfilled and a 105 BBL shallow low profile above-ground tank set atop the BGT location. The area will be reclaimed when the well is plugged and abandoned.

- 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.

BP did not meet the 60 closure completion requirement due to an error in internal tracking. Closure report on C-144 form is included including photos of reclamation completion.

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

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

* Attach Additional Sheets If Necessary

State of New Mexico Energy Minerals and Natural Resources

Revised April 3, 2017

Form C-141

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

bp



BP America Production Company 200 Energy Court Farmington, NM 87401

August 25, 2017

Bureau of Land Management Whitney Thomas 6251 College Suite A Farmington, NM 87402

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank

Well Name: ATLANTIC LS 002R

API#: 3004529384

Dear Mrs. Thomas,

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 the below grade tank on its well pad located on your surface. BP plans to commence this work on or about August 28, 2017. 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

Garifalos, Erin

From:

Buckley, Farrah (CH2M HILL)

Sent:

Friday, August 25, 2017 11:32 AM

To:

'Smith, Cory, EMNRD'; 'Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)';

'brandon.powell@state.nm.us'

Cc:

'jeffcblagg@aol.com'; 'blagg_njv@yahoo.com'; Moskal, Steven; Garifalos, Erin

Subject:

BP Pit Close Notification - ATLANTIC LS 002R

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

August 25, 2017

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

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

ATLANTIC LS 002R API 30-045-29384 (G) Section 24– T31N – R10W 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 a 95bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around August 28, 2017.

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

Farrah Buckley BGT Project Support 970-946-9199 -cell

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CLIENT: BP	P.O. BOX 87, B	NGINEERING, IN LOOMFIELD, NN 5) 632-1199		API #: 3004 TANK ID (if applicble):	529384 A
FIELD REPORT:	(circle one): BGT CONFIRMATION /		OTHER:		of 1
SITE INFORMATION QUAD/UNIT: G SEC: 24 TWP: 1/4 -1/4/FOOTAGE: 1,610'N / 1,4	31N RNG: 10W PM:	IC LS # 2R NM CNTY: SJ YPE: FEDERAL/ STATE /	ST: NM	DATE FINISHED:	08/30/17
		STRIKE ONTRACTOR: BP - J. GC		SPECIALIST(S):	NJV
1) 95 BGT (SW/DB) 2)	DISTANCE/BEA		6,571' 9', N10E		
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # O	R LAB USED: HALL			OVM READING (ppm)
1) SAMPLE ID: 5PC - TB @ 5' 2) SAMPLE ID: 3) SAMPLE ID: 4) SAMPLE ID: 5) SAMPLE ID:		SAMPLE TIME:	LAB ANALYSIS: LAB ANALYSIS: LAB ANALYSIS: LAB ANALYSIS: LAB ANALYSIS:	15B/8021B/300.0 (CI	
SOIL DESCRIPTION SOIL COLOR: MODE COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY/SLIGHTLY MOIST MOIST W SAMPLE TYPE: GRAB (COMPOSITE) # DISCOLORATION/STAINING OBSERVED: YES IN	RATE BROWN Y COHESIVE / COHESIVE / HIGHLY COHESIVE DOSE FIRM / DENSE VERY DENSE ET / SATURATED / SUPER SATURATED FOR PTS	PLASTICITY (CLAYS): NON PLASTIC DENSITY (COHESIVE CLAYS & HC ODOR DETECTED: YES NO ANY AREAS DISPLAYING WETNES	C/SLIGHTLY PLASTIC / C SILTS): SOFT / FIRM / EXPLANATION -	OHESIVE / MEDIUM PLASTIC STIFF / VERY STIFF / HAI	
APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA: OTHER: NMOCD OR BLM NOT PRESEN SAMPLE FROM SOILS ABOVE SANDE EXCAVATION DIMENSION ESTIMATION:	DAND/OR OCCURRED: YES NO EXPLAYED NO EXPLANATION - 105 BBL T TO WITNESS CONFIRMATION S.	ANATION: . SHALLOW LOW PROFILE	5.5 FT. BELOW GR	NK TO BE SET ATOP I	COLLECTED
	EAREST WATER SOURCE: <1,000'			CD TPH CLOSURE STD:	100 ppm
SITE SKETCH	BGT Located: off on site	PLOT PLAN circ	le: attached 0VM	CALIB. READ. = NA	ppm
BERM	PBGTL T.B. ~ 5' B.G.	SEPARATOR	N TIME		ppm NA
PROD. TANK		COMPRESSOR SOUND WALLS	R V P.		
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATIO		LOW; T.H. = TEST HOLE; ~ = APPROX.; \	(- S.P.D. WH. = WELL HEAD;	OVM = Organic Val ppm = parts per mi BGT Sidewalls Visible: BGT Sidewalls Visible: BGT Sidewalls Visible:	por Meter illion : Y / N : Y / N
	OW-GRADETANK LOCATION; SPD = SAMPLE PO WALL; DW-DOUBLE WALL; SB - SINGLE BOTT ERY DATE: 3/15/2015.			lagnetic declination	: 10°E

Analytical Report

Lab Order 1708H27

Date Reported: 9/6/2017

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB @ 5' (95)

Project: ATLANTIC LS #2R

Collection Date: 8/30/2017 1:30:00 PM

Lab ID: 1708H27-001

Matrix: SOIL

Received Date: 8/31/2017 7:10:00 AM

Analyses	rses Result PQL Qual		l Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS			Х		Analyst	MRA
Chloride	ND	30	mg/Kg	20	8/31/2017 10:47:19 AM	33647
EPA METHOD 8015M/D: DIESEL RANGE	ORGANIC	S			Analyst	TOM
Diesel Range Organics (DRO)	ND	9.9	mg/Kg	1	8/31/2017 10:10:12 AM	33646
Motor Oil Range Organics (MRO)	ND	49	mg/Kg	1	8/31/2017 10:10:12 AM	33646
Surr: DNOP	89.8	70-130	%Rec	1	8/31/2017 10:10:12 AM	33646
EPA METHOD 8015D: GASOLINE RANG	E				Analyst	NSB
Gasoline Range Organics (GRO)	ND	2.8	mg/Kg	1	8/31/2017 11:47:16 AM	33627
Surr: BFB	76.0	54-150	%Rec	1	8/31/2017 11:47:16 AM	33627
EPA METHOD 8021B: VOLATILES					Analyst	NSB
Benzene	ND	0.014	mg/Kg	1	8/31/2017 11:47:16 AM	33627
Toluene	ND	0.028	mg/Kg	1	8/31/2017 11:47:16 AM	33627
Ethylbenzene	ND	0.028	mg/Kg	1	8/31/2017 11:47:16 AM	33627
Xylenes, Total	ND	0.057	mg/Kg	1	8/31/2017 11:47:16 AM	33627
Surr: 4-Bromofluorobenzene	113	66.6-132	%Rec	1	8/31/2017 11:47:16 AM	33627

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

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
- PQL Practical Quanitative Limit
- 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 Page 1 of 5
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

WO#:

1708H27

06-Sep-17

Client:

Blagg Engineering

Project:

ATLANTIC LS #2R

Sample ID MB-33647

SampType: mblk

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 33647

RunNo: 45341

Prep Date: 8/31/2017

Analysis Date: 8/31/2017

SeqNo: 1437822

Units: mg/Kg

Analyte

HighLimit

%RPD **RPDLimit** Qual

Chloride

ND 1.5

Result

PQL

TestCode: EPA Method 300.0: Anions

SPK value SPK Ref Val %REC LowLimit

0

Client ID:

LCSS

Batch ID: 33647

PQL

1.5

SampType: Ics

RunNo: 45341

Prep Date: 8/31/2017

Sample ID LCS-33647

Analysis Date: 8/31/2017

SeqNo: 1437823

Units: mg/Kg

Analyte

HighLimit

%RPD **RPDLimit**

Qual

15.00

%REC 91.4

LowLimit

Chloride

14

SPK value SPK Ref Val

90

110

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix D
- H Holding times for preparation or analysis exceeded
- Not Detected at the Reporting Limit ND
- **PQL** Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- J
- P Sample pH Not In Range
- Reporting Detection Limit RL
- Sample container temperature is out of limit as specified

Analyte detected below quantitation limits

Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1708H27

06-Sep-17

Client:

Blagg Engineering

Project:

ATLANTIC LS #2R

Sample ID LCS-33646

SampType: LCS

TestCode: EPA Method 8015M/D: Diesel Range Organics

Client ID:

LCSS

Batch ID: 33646

RunNo: 45327

95.1

99.3

%RPD

%RPD

Prep Date: 8/31/2017

Analysis Date: 8/31/2017

SeqNo: 1436150

Units: mg/Kg

Qual

Analyte Diesel Range Organics (DRO) Surr: DNOP

Result PQL 48 5.0

SPK value SPK Ref Val 50.00

5.000

10.00

%REC LowLimit HighLimit

114

130

RPDLimit

Qual

Sample ID MB-33646

SampType: MBLK

TestCode: EPA Method 8015M/D: Diesel Range Organics

0

RPDLimit

Client ID: **PBS**

Prep Date:

Surr: DNOP

Batch ID: 33646

50

Analysis Date: 8/31/2017

10

SeqNo: 1436151

Units: mg/Kg

HighLimit

Page 3 of 5

Analyte Diesel Range Organics (DRO) Motor Oil Range Organics (MRO)

8/31/2017

Result ND ND

10

SPK value SPK Ref Val %REC LowLimit PQL 10

102

70

73.2

70

130

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Holding times for preparation or analysis exceeded Η

Not Detected at the Reporting Limit

POL Practical Quanitative Limit

% 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

Sample pH Not In Range

RL Reporting Detection Limit

P

Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

WO#:

1708H27

06-Sep-17

Client:

Blagg Engineering

Project:

ATLANTIC LS #2R

Sample ID MB-33627

SampType: MBLK

TestCode: EPA Method 8015D: Gasoline Range

LowLimit

Client ID:

PBS

Batch ID: 33627

RunNo: 45344

Prep Date:

8/30/2017

Analysis Date: 8/31/2017

PQL

5.0

SeqNo: 1437225

Units: mg/Kg

150

HighLimit

Qual

Analyte Gasoline Range Organics (GRO)

Surr: BFB

810

1000

SPK value SPK Ref Val

80.8

54

%RPD **RPDLimit**

SampType: LCS

TestCode: EPA Method 8015D: Gasoline Range

%REC

%RPD

Sample ID LCS-33627 Client ID: LCSS

Batch ID: 33627

5.0

RunNo: 45344

8/30/2017

Analysis Date: 8/31/2017

SeqNo: 1437226

Units: mg/Kg

Analyte

Prep Date:

Result PQL

Result

ND

SPK value SPK Ref Val 25.00

%REC LowLimit 95.3

0

HighLimit

RPDLimit Qual

Gasoline Range Organics (GRO) Surr: BFB

24 890

1000

88.5

76.4 54

150

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- Holding times for preparation or analysis exceeded H
- ND Not Detected at the Reporting Limit
- **PQL** Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- Value above quantitation range E

Reporting Detection Limit

- J Analyte detected below quantitation limits
- P Sample pH Not In Range

RL

Sample container temperature is out of limit as specified

Page 4 of 5

Hall Environmental Analysis Laboratory, Inc.

1.2

WO#:

1708H27

06-Sep-17

Client:

Blagg Engineering

Project:

Surr: 4-Bromofluorobenzene

ATLANTIC LS #2R

Sample ID MB-33627 SampType: MBLK TestCode: EPA Method 8021B: Volatiles Client ID: PBS Batch ID: 33627 RunNo: 45344 Prep Date: 8/30/2017 Analysis Date: 8/31/2017 SeqNo: 1437243 Units: mg/Kg Analyte Result **PQL** SPK value SPK Ref Val %REC HighLimit %RPD **RPDLimit** LowLimit Qual 0.025 ND Benzene Toluene ND 0.050 ND 0.050 Ethylbenzene Xylenes, Total ND 0.10

121

66.6

132

1.000

Sample ID LCS-33627	SampType: LCS TestCode: EPA Method 8							tiles				
Client ID: LCSS	Batch	n ID: 33	627	F								
Prep Date: 8/30/2017	Analysis D	ate: 8/	31/2017	S	SeqNo: 1	4 Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	1.1	0.025	1.000	0	112	80	120					
Toluene	1.1	0.050	1.000	0	112	80	120					
Ethylbenzene	1.1	0.050	1.000	0	111	80	120					
Xylenes, Total	3.4	0.10	3.000	0	114	80	120					
Surr: 4-Bromofluorobenzene	1.2		1.000		124	66.6	132					

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
- PQL Practical Quanitative Limit
- 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

Page 5 of 5



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: 1708H27 RcptNo: 1 aone Sham Received By: **Anne Thorne** 8/31/2017 7:10:00 AM On In Completed By: 8/31/2017 7:50:50 AM **Anne Thorne** 8-31-2017 Reviewed By: IMO Chain of Custody Not Present Yes 🗌 No 🗌 1. Custody seals intact on sample bottles? No 🗌 Not Present Yes V 2. Is Chain of Custody complete? 3 How was the sample delivered? Courier Log In No 🗌 NA 🗌 Yes 🗸 4. Was an attempt made to cool the samples? No 🗌 NA 🗌 5. Were all samples received at a temperature of >0° C to 6.0°C Yes V No 🗌 Yes V 6. Sample(s) in proper container(s)? No 🗌 Yes 🗸 7. Sufficient sample volume for Indicated test(s)? No 🗌 Yes V 8. Are samples (except VOA and ONG) properly preserved? No V NA 🗌 Yes 9. Was preservative added to bottles? Yes No 🗌 No VOA Vials 10. VOA vials have zero headspace? Yes No 🗸 11. Were any sample containers received broken? # of preserved bottles checked Yes V No 🗌 for pH: 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? Yes V No 🗌 13. Are matrices correctly identified on Chain of Custody? No 🗌 Yes 🗸 14. Is it clear what analyses were requested? Yes V No 🗌 Checked by: 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) Yes No 🗌 16. Was client notified of all discrepancies with this order? NA V Person Notified: Date By Whom: Via: eMail Phone Fax In Person Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp °C Condition Seal Intact Seal No Seal Date Signed By

VI	Juani-Ol-Oustouy Record			Tall-Albana	Titlle.	SAME				H	ALI	F	N	TI	20	NI	ME	N	ГА		
Client:	BLAG	G ENGR.	/ BP AMERICA	☐ Standard	☑ Rush _	DAY)	-		_								R/				*
				Project Name					5		ww.h										
Mailing A	ddress:	P.O. BO	X 87	A	TLANTIC LS	# 2R		490)1 H	awkin								9			
		BLOOM	FIELD, NM 87413	Project #:						5-345			Fax								
Phone #:		(505) 63	2-1199				1	1	14	Pel		200	lysis								
email or F	ax#:			Project Manag	Project Manager:						T		-				F				_
QA/QC Pa	_		Level 4 (Full Validation)	NELSON VELEZ		(80218)	only)	/ MRO)		(5)		04,50	PCB's			ter - 300.1)			61		
Accreditat	ion:			Sampler:	NELSON V	ELEZ ny	\$ (8	(Gas	DRO /	= =	SIN		02,1	8082			300.0 / water			sample	
□ NELAP		□ Other			Yes .		1	TP	_	418.1)	270		N, S	-		(A)	00.00		1		S
□ EDD (T	ype)			Sample Temp			1	+	GRC	9 po	or 8	tals	N,	ide	A	9-			9	osite	(7 0
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative	AT CALLY (F) HEALING	×	X + MTBE + TPH (Gas only)	TPH 8015B (GRO	TPH (Method 418.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	1 Pesticides	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil -		b sample	. composite	Air Bubbles (Y or N)
				meath tot	Туре	1708 621	втех	BTEX	TH	TPH	A	RCR.	Ani	8081	826	827	Short		Grab	5 pt.	Air E
8/30/17	1336	SOIL	5PC-TB@ 5 '(95)	4 oz 1	Cool	-001	٧		٧								٧			٧	
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											T			-							_
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Date;	Time:	Relinquishe	ed by:	Received by:		Date Time	Rem	arks	-	BILL DIF	ECTLY	TO BP	USIN	THE	CONT	ACT V	NITH C	ORRE	SPON	DING	VID
8/30/17	1512	9/1	my/	100	Nr. 1 d. 1		& REFERENCE # WHEN APPLICABLE;														
Date:	5 3 Time:	Relinquishe	ed by:	Received by.	^	Date Time	CC			VHIXO			/ VA	VCE	HIXO	PN					
8/30/17	17 19 05 Red So. 1		Un	u Sh	08/31/17	Refe	eren			- 675											
	If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report																				



