

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 Production Co. | Contact: Steve Moskal | |
| Address: 380 Airport Rd., Durango, CO 81303 | Telephone No.: 505-330-9179 | |
| Facility Name: Gallegos Canyon Unit 042 | Facility Type: Water Disposal Well <u>Natural Gas well</u> (sm) | |
| Surface Owner: Fee | Mineral Owner: Federal | API No. 3004507557 |

LOCATION OF RELEASE

| | | | | | | | | |
|------------------|---------------|-----------------|--------------|----------------------|---------------------------|------------------------|------------------------|------------------|
| Unit Letter N | Section 12 | Township 28N | Range 13W | Feet from the 990 | North/South Line South | Feet from the 1,650 | East/West Line West | County: San Juan |
|------------------|---------------|-----------------|--------------|----------------------|---------------------------|------------------------|------------------------|------------------|

Latitude 36.67275°

Longitude -108.117408°

36.672211

173965

NATURE OF RELEASE



| | | |
|--|--|--|
| Type of Release: produced water | Volume of Release: 14 bbl | Volume Recovered: 0 bbls |
| Source of Release: Packing leak on rod pump | Date and Hour of Occurrence: unknown | Date and Hour of Discovery: 1/16/2018; 11:00 AM |
| Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required | If YES, To Whom? OIL CONS. DIV DIST. 3 | |
| By Whom? Steve Moskal | Date and Hour: | |
| Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. FEB 13 2018 | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Packing on rod pump failed allowing produced water to leak for an unknown duration. The area of impacts was measured to determine the discharge volume. The well was shut in and the packing replaced. The impacted soil was raked in and sampled. Sample results indicated further remediation is required.

Describe Area Affected and Cleanup Action Taken.* The soil samples indicate TPH and chlorides above the site specific spill and release guidelines. Delineation or remediation will be performed at a later date. Laboratory results are attached. BP plans to excavated the upper 1-3' feet of soil to remove the impacts. The excavated area will be sampled to ensure removal of impacts to comply with the spill and release guidelines. The soil will be placed in a bermed area on the location and a gypsum amendment added with water. The material will be actively worked every one to two weeks and resampled in approximately 30 days. If the chloride concentrations are below the landfarm acceptance level, the soil will be hauled off site for landfarm treatment. If the chloride and hydrocarbon levels are below the spill and release guidelines, the soil will be used or thin spread on 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: <u>2/23/18</u> | Expiration Date: |
| E-mail Address: steven.moskal@bp.com | Conditions of Approval: <u>Attach edc</u> | Attached <input checked="" type="checkbox"/> |
| Date: February 12, 2018 | Phone: 505-330-9179 | |

* Attach Additional Sheets If Necessary

#NCS 1803732121

(2)

Smith, Cory, EMNRD

From: Smith, Cory, EMNRD
Sent: Friday, February 23, 2018 9:31 AM
To: Moskal, Steven
Cc: Fields, Vanessa, EMNRD
Subject: RE: GCU 42 C-141

Steve,

OCD has received BP work plan on February 13, 2018. OCD approved BP work plan with the following conditions of approval:

- BP will start excavation activities no later than March 23, 2018
- BP will sample the excavation for TPH, BTEX, Benzene and Chlorides
- BP will sample the Bio remediation pile by April 30, 2018 for TPH, BTEX, Benzene and Chlorides
- BP will sample the vadose zone beneath the remediation pile for TPH, BTEX, Benzene and Chlorides.
- BP will schedule with OCD District III for closure confirmation sampling for both the excavation and remediation pile with at least 24 hour notice.

If you have any 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: Smith, Cory, EMNRD
Sent: Tuesday, February 6, 2018 9:12 AM
To: Moskal, Steven <Steven.Moskal@bp.com>
Cc: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Subject: GCU 42 C-141

Steve,

I have approved the GCU #42 C-141 since there was no time lines for delineation or remediation please submit a work plan to the OCD office by February 20, 2018.

The approved c-141 will be online asap.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410