District I
1625 N. Fuench 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 April 3, 2017

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.

6367 Pit, Below-Grade Tank, or									
Proposed Alternative Method Permit or Closure Plan Application NMOCD									
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: GARTNER A 005A									
API Number: 3004522368 OCD Permit Number: U/L or Qtr/Qtr F Section 27 Township 30N Range 08W County: San Juan									
Center of Proposed Design: Latitude 36.78561 Longitude -107.66728 NAD83									
Surface Owner: Federal State Private Tribal Trust or Indian Allotment									
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: Thicknessmil LLDPE HDPE PVC Other									
String-Reinforced									
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D									
Below-grade tank: Subsection I of 19.15.17.11 NMAC TANK A Volume: 95									
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.									
Submittal of all exception request is required. Exceptions must be submitted to the Santa Fe Environmental bureau office for consideration of approval.									
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: Instiffections and/or demonstrations of activalence are required. Places refer to 10.15.17 NMAC for aviidance.	
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 acceptance of the compliance for each siting criteria below in the application.	otable 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.	☐ Yes ☐ No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ 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
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☐ No
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 	
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).	☐ Yes ☐ No
- Topographic map; Visual inspection (certification) of the proposed site	
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	☐ Yes ☐ No
application.	
- 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										
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No									
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 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: or Permit Number:										

Permaneat 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 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	documents are
<u>Proposed Closure</u> : 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	1 '11'
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F 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	luid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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	
15. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 19.15.17.10 NMAC for guidance.	rce material are 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 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 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	☐ 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	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	Yes No

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 beling the complete to the best of my knowledge and beli								
mail address: Date: Telephone:								
e-mail address:Telephone:								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment),								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 2/20								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment),								
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 2/20	the closure report.							
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 3/20 OCD Permit Number: 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 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.	the closure report.							

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

GARTNER A 005A

API No. 3004522368

Unit Letter F Section 27 T 30N R 08W

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	< 0.017
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.068
TPH	US EPA Method SW-846 418.1 or 8015 extended	100	<47
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. The location will be reclaimed when the well is 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 has been backfilled and a 105 BBL shallow low profile above-grade tank set atop BGT location. The location will be reclaimed once 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-grade tank set atop BGT location. The location will be reclaimed once 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-grade tank set atop BGT location. The location 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.

The area has been backfilled and a 105 BBL shallow low profile above-grade tank set atop BGT location. The location 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 revegetation.

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

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. Feench 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

Form C-141 Revised April 3, 2017

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.

			Rele	ease Notific	cation	n and Co	orrective A	ction	1						
						OPERA	ΓOR		Initia	al Report	■ Fi	inal Report			
				tion Compan			n Garifalos								
				n, NM 87401		Telephone No. (832) 609-7048 Facility Type: Natural Gas Well									
Facility Na	meGARI	NER A 00	5A			Facility Typ	e: Natural Ga	as we	ell						
Surface Ow	ner: Fed	eral		Mineral C)wner:	Federal			API No	.3004522	2368				
				LOCA	TIO	N OF RE	LEASE								
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the		West Line	County		1			
F	27	30N	08W	1,515	Nor	rth	1,500	We	st	5	San Jua				
			Latitud	_e 36.78561	L	ongitude -1	07.66728	NAD	83						
						OF REL									
Type of Release:: none Volume of Release:: unknown Volume Recovered:: N/A															
Source of Release: below grade tank - 95 bbl							Iour of Occurrence	ce:		Hour of Disco	overy:				
Was Immedi						n/a If YES, To	Whom?		n/a						
11 40 111111			Yes 🗸	No 🔲 Not Re	equired	,									
By Whom?						Date and F									
Was a Water	course Read	ched?	Yes 🗸	No		If YES, Vo	olume Impacting t	the Wat	ercourse.						
If a Waterson	rea was Im	pacted, Descri													
II a watereo	arse was im	pacted, Descri	ibe I uny.												
Describe Cau	ise of Probl	em and Remed	dial Action	Taken.*	olina (of the soil	beneath the	BG1	was do	ne durino	remo	val			
					_		d for Chloric			_	-				
					-		Field reports								
Describe Are	a Affected	and Cleanup A	Action Tak	en.*											
		1		No actio			inal laborate	ory a	nalysis d	letermine	ed no				
				remedia	actio	on is requ	ired.								
												_			
							knowledge and und perform correct								
public health	or the envi	ronment. The	acceptanc	e of a C-141 repo	ort by th	e NMOCD m	arked as "Final R	eport"	does not reli	eve the opera	ator of lia	bility			
should their	operations h	ave failed to a	dequately	investigate and r	emediat	e contaminati	on that pose a three the operator of	eat to g	round water	, surface water	er, humai	n health			
		ws and/or regu		tance of a C-141	report u	ides not renev	e the operator of	respons	ionity for co	omphance wi	uii aiiy ot	nei			
		-1					OIL CON	SERV	ATION	DIVISIO	N				
1	run 9	Willalo	24												
Signature:						Approved by	Environmental S	pecialis	t:						
Printed Name	Erin C	wifalo Sarifalos													
Title: Field	d Envir	onmenta	al Coo	rdinator		Approval Dat	te:		Expiration l	Date:					
E-mail Addre	ess: erin.	garifalos	@bp.	com		Conditions of	Approval:			A ++1 - 1					
Date: Marc				(832) 609-70)48					Attached					

bp



BP America Production Company 380 Airport Rd Durango, CO 81303 Phone: (970) 247 6800

January 12, 2018

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: GARTNER A 005A API #: 3004522368

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 January 17, 2018. 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 (832)-609-7048.

Sincerely,

Erin Garifalos

BP America Production Company

From:

Buckley, Farrah (CH2M HILL)

To:

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

Cc: Subject: ieffcblagg@aol.com; blagg_niv@yahoo.com; Garifalos, Erin RE: BP Pit Close Notification - GARTNER A 005A

Date:

Friday, January 12, 2018 5:07:32 PM

This site has been rescheduled to start on Monday January 15th. The pit is scheduled to be removed at 12pm.

Thanks, Farrah

From: Buckley, Farrah (CH2M HILL) Sent: Friday, January 12, 2018 2:44 PM

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

Cc: 'jeffcblagg@aol.com'; 'blagg_njv@yahoo.com'; Garifalos, Erin

Subject: BP Pit Close Notification - GARTNER A 005A

BP America Production Company 380 Airport Rd Durango, CO 81303 Phone: (970) 247 6800

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

January 12, 2018

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

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

GARTNER A 005A API 30-045-22368 (F) Section 27 – T30N – R08W 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 a 95bbl and a 21bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around January 17, 2018.

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

Sincerely,

Erin Garifalos

Field Environmental Coordinator – San Juan Cell: 832-609-7048

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

This email and any attachments are intended only for the addressee(s) listed above and may contain confidential, proprietary, and/or privileged information. If you are not an intended recipient, please immediately advise the sender by return email, delete this email and any attachments, and destroy any copies of same. Any unauthorized review, use, copying disclosure or distribution of this email and any attachments is prohibited.

CLIENT: BP	C. 187413	API #: 300452	_				
	(50	5) 632-1199		(if applicble):	Α		
FIELD REPORT:	(circle one): BGT CONFIRMATION	RELEASE INVESTIGATION / O	THER:	PAGE #: 1	of		
SITE INFORMATION	I: SITE NAME: GARTN	ER A # 5A		DATE STARTED: 01	1/18/18		
QUAD/UNIT: F SEC: 27 TWP:	30N RNG: 8W PM:	NM CNTY: SJ	ST: NM	DATE FINISHED:			
1/4 -1/4/FOOTAGE: 1,515'N / 1,5	500'W SE/NW LEASE T	YPE: FEDERAL STATE /	FEE / INDIAN	ENVIRONMENTAL			
		STRIKE ONTRACTOR: BP - J. GO			NJV		
REFERENCE POINT	: WELL HEAD (W.H.) GPS	COORD.: 36.7858	8 X 107.66714	GL ELEV.:	5,881'		
1) 95 BGT (SW/DB) - A	GPS COORD.: 36	.78561 X 107.66728	DISTANCE/BEA	RING FROM W.H.: 121',	S26W		
2)	DISTANCE/BEA	RING FROM W.H.:					
3)				RING FROM W.H.:			
,		RING FROM W.H.:					
					OVM READING		
		15B/8021B/300.0 (CI)	(ppm)				
	EID: 5PC - TB @ 5' (95) - A SAMPLE DATE: 01/18/18 SAMPLE TIME: 1240 LAB ANALYSIS: EID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: EID:				TO A		
SAMPLE ID: SAMPLE DATE: SAMPLETIME: LAB ANALYSIS: SAMPLE ID: SAMPLE DATE: SAMPLETIME: LAB ANALYSIS: SOIL DESCRIPTION: SOIL TYPE: SAND SILTY SAND SILT / SILTY CLAY / CLAY / GRAVEL / OTHER OIL COLOR: MODERATE BROWN PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC							
5) SAMPLE ID:							
COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY (SLIGHTLY MOIST) MOIST / W SAMPLE TYPE: GRAB (COMPOSITE) #	Y COHESIVE / COHESIVE / HIGHLY COHESIVE DOSE FIRM DENSE / VERY DENSE ET / SATURATED / SUPER SATURATED OF PTS5	DENSITY (COHESIVE CLAYS & HC ODOR DETECTED: YES NO	SILTS): SOFT / FIRM / EXPLANATION -	STIFF / VERY STIFF / HARD			
APPARENT EVIDENCE OF A RELEASE OBSERVE	D AND/OR OCCURRED : YES NO EXPL	ANATION:					
			ABOVE-GRADE TAI	NK TO BE SET ATOP BG	T LOCATION.		
EXCAVATION DIMENSION ESTIMATION:	NA ft. X NA	ft. X NA ft.	EXCAVATION EST	ΠΜΑΤΙΟΝ (Cubic Yards) :	NA		
DEPTH TO GROUNDWATER: <100 ' N	EAREST WATER SOURCE: >1,000	NEAREST SURFACE WATER: _	<200' NMOC	D TPH CLOSURE STD:	100 ppm		
SITE SKETCH	BGT Located: off on sit	e PLOT PLAN circ	le: attached OVM	CALIB. READ. = NA	ppm RF=1.00		
	A	CALIB. GAS = NA	_ppm RF =1.00				
					NA		
	,		N	MISCELL. NO	OTES		
	BERM SE	PARATOR	l w	/O:			
	IGTL /		R	EF#: P-918			
	95 BGT (SW/DB) - A GPS COORD.: GPS AMPLE DATE GPS A						
	SAMPLE ID: SAMPLE ID: SAMPLE DATE SAMPLE TIME: LAB ANALYSIS: LAB ANAL						
FENC	CE X		Po	ermit date(s): 06/	/14/10		
		COMPRESSOR			/07/17		
		COMPRESSOR	Tar	ppm = parts per millio	n		
			Α	BGT Sidewalls Visible: Y)/ N		
		Х	- S.P.D.	BGT Sidewalls Visible: Y			
NOTES: BGT = BELOWAGRADE TANK; E.D. = EXCAVATION		ELOW, T.H. = TEST HOLE; ~ = APPROX.; V	N.H. = WELL HEAD;	BGT Sidewalls Visible: Y			
	E WALL; DW - DOUBLE WALL; SB - SINGLE BOT	TOM; DB - DOUBLE BOTTOM.	10	lagnetic declination: '	10°E		
NOTES: GOOGLE EARTH IMAGI	ERY DATE: 10/5/2016.	ONSITE: 01/18/1	IR .				

Analytical Report

Lab Order 1801957

Date Reported: 1/24/2018

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Project: GARTNER A 5A

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

Collection Date: 1/18/2018 12:40:00 PM

Lab ID: 1801957-001

Matrix: SOIL

Received Date: 1/19/2018 7:50:00 AM

Analyses	Result	PQL Qua	l Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS					Analyst	MRA
Chloride	ND	30	mg/Kg	20	1/19/2018 1:04:26 PM	36110
EPA METHOD 8015D MOD: GASOL	INE RANGE				Analyst	AG
Gasoline Range Organics (GRO)	ND	3.4	mg/Kg	1	1/19/2018 10:58:58 AM	G48563
Surr: BFB	103	70-130	%Rec	1	1/19/2018 10:58:58 AM	G48563
EPA METHOD 8015M/D: DIESEL RA	ANGE ORGANICS				Analyst	TOM
Diesel Range Organics (DRO)	ND	9.4	mg/Kg	1	1/19/2018 11:16:23 AM	36104
Motor Oil Range Organics (MRO)	ND	47	mg/Kg	1	1/19/2018 11:16:23 AM	36104
Surr: DNOP	97.6	70-130	%Rec	1	1/19/2018 11:16:23 AM	36104
EPA METHOD 8260B: VOLATILES	SHORT LIST				Analyst	AG
Benzene	ND	0.017	mg/Kg	1	1/19/2018 10:58:58 AM	R48563
Toluene	ND	0.034	mg/Kg	1	1/19/2018 10:58:58 AM	R48563
Ethylbenzene	ND	0.034	mg/Kg	1	1/19/2018 10:58:58 AM	R48563
Xylenes, Total	ND	0.068	mg/Kg	1	1/19/2018 10:58:58 AM	R48563
Surr: 4-Bromofluorobenzene	108	70-130	%Rec	1	1/19/2018 10:58:58 AM	R48563
Surr: Toluene-d8	95.8	70-130	%Rec	1	1/19/2018 10:58:58 AM	R48563

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 6
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

Chain-of-Custody Record				Turn-Around 1	ime:	SAME					н	ΙΔΙ		E	V	r R	ON	M	FN.	TA			
Client:	BLAG	G ENGR.	/ BP AMERIC	A	☐ Standard	☑ Rush _	DAY											ABO					
					Project Name:					www.hallenvironmental.com													
Mailing Ad	ddress:	P.O. BO	X 87		GARTNER A #5A				4901 Hawkins NE - Albuquerque, NM 87109														
		BLOOM	FIELD, NM 874	13	Project #:					Tel. 505-345-3975 Fax 505-345-4107										7			
Phone #:		(505) 63	32-1199						1					A	naly	sis F	Requ	iest			1		
email or F	ax#:				Project Manag	jer:	च न																
QA/QC Package: Standard Level 4 (Full Validation)				ERIN GARI	FALOS		845 (80218)	only)	/ MRO)			IS)		04,50	PCB's		er - 300.1)			a)			
Accreditat	ion:			,	Sampler:	NELSON VI	ELEZ)8) E	(Gas	DRO /	1	F	SIN		02,	087		/ water			sample	
□ NELAP		□ Other			On less	On ice ZYes E Ne. 17/7				+ TPH (Gas	-	418.	504.	8270		03,N	Si	(AC	000			e sa	S
□ EDD (T	ype)				Sample Temp	erature \mathcal{Q},\mathcal{J}	X/ 105	19	#	##	(GR(poc	poc	or	etals	Ž,	cide	E 3	11-3		ele	osit	30
Date	Time	Matrix	Sample R	equest ID	Container Type and #	Preservative Type	HEALNO No.1957		BTEX +-MF	BTEX + MTBE	TPH 8015B (GRO	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F,Cl,NO ₃ ,NO ₂ ,PO ₄ ,SO ₄)	8081 Pesticides / 8082	8260B (VOA)	Chloride (soil - 300.0		Grab sample	5 pt. composite	Air Bubbles (Y or N)
1/18/18	1246	SOIL	5PC - TB @	5 1 (95)-A	4 oz 1	Cool	7	10	٧		٧								٧			٧	
															1								
81/81/1		301-	500-10C	6'(=)8		Con	a	12	1		1				-		-		V	/		~	•
			/																			\Box	
			,																				
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															\neg								
																\top	\top						
														\neg		1	7		\top				
Date: Time: 153 Relinquished by: 1/18/18 / 18 Relinquished by:					Received by:	Walte	Date Time	37	co	١	CT: /ID:	& REF ERIN VHIX	GAF ONE	CE#W RIFAL VB2	VHEN	SING T APPLI VAN	CABLI		WITH	CORR	SPON	IDING	VID
118/18	If necessa	ny, samples s	submitted to Half Envir	ronmental may be si	ubcontracted to other	accredited laboratorie		750 notice of	1	ereno		-	P - 9		ata wi	ilf be cle	early n	otated o	on the	analytica	al repo	irt.	

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1801957

24-Jan-18

Client:

Blagg Engineering

Project:

GARTNER A 5A

Sample ID MB-36110

SampType: mblk

TestCode: EPA Method 300.0: Anions

Client ID:

Sample ID LCS-36110

PBS

Batch ID: 36110

PQL

1.5

RunNo: 48569

Prep Date: 1/19/2018 Analysis Date: 1/19/2018

Units: mg/Kg

HighLimit

Analyte

Result

SeqNo: 1563719

SPK value SPK Ref Val %REC LowLimit

%RPD

RPDLimit

Qual

Chloride

SampType: Ics

TestCode: EPA Method 300.0: Anions

RunNo: 48569

Client ID: Prep Date: 1/19/2018

LCSS

Analysis Date: 1/19/2018

14

ND

SeqNo: 1563721

Units: mg/Kg HighLimit

%RPD **RPDLimit**

Qual

PQL

Batch ID: 36110

SPK value SPK Ref Val %REC

LowLimit

Result

1.5

110

Chloride

15.00

90

93.2

Qualifiers:

Value exceeds Maximum Contaminant Level.

Sample Diluted Due to Matrix D

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit Practical Quanitative Limit **PQL**

% Recovery outside of range due to dilution or matrix

Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

Page 3 of 6

Sample pH Not In Range

RL Reporting Detection Limit Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

Result

46

4.4

9.3

WO#:

1801957

24-Jan-18

Client:

Blagg Engineering

Project:

GARTNER A 5A

Sample ID LCS-36104

SampType: LCS

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

Client ID: LCSS

Batch ID: 36104

RunNo: 48560

Prep Date: 1/19/2018

%REC

91.4

88.8

SPK value SPK Ref Val

50.00

5.000

10.00

LowLimit

70

Units: mg/Kg

130

Analysis Date: 1/19/2018 PQL

SeqNo: 1561811

HighLimit

RPDLimit

Qual

Diesel Range Organics (DRO) Surr: DNOP Sample ID MB-36104

SampType: MBLK

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

%RPD

Client ID: PBS

Prep Date:

Surr: DNOP

1/19/2018

Batch ID: 36104 Analysis Date: 1/19/2018

RunNo: 48560

SeqNo: 1561812

Units: mg/Kg

HighLimit

%RPD

RPDLimit Qual

Analyte Diesel Range Organics (DRO) Motor Oil Range Organics (MRO) Result ND 10 ND 50

93.4

SPK value SPK Ref Val %REC LowLimit

70

130

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Holding times for preparation or analysis exceeded H

Not Detected at the Reporting Limit ND

PQL Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

Value above quantitation range

Analyte detected below quantitation limits

Sample pH Not In Range

RL Reporting Detection Limit

Sample container temperature is out of limit as specified

Page 4 of 6

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1801957

24-Jan-18

Client:

Blagg Engineering

Project:

GARTNER A 5A

Sample ID 2.5ug gro Ics SampType: LCS TestCode: EPA Method 8015D Mod: Gasoline Range Client ID: LCSS Batch ID: G48563 RunNo: 48563 Prep Date: Analysis Date: 1/19/2018 SeqNo: 1561861 Units: mg/Kg %REC HighLimit %RPD **RPDLimit** Analyte Result PQL SPK value SPK Ref Val LowLimit Qual Gasoline Range Organics (GRO) 25 5.0 25.00 0 98.4 70 130 Surr: BFB 480 500.0 70 95.1 130

Sample ID rb SampType: MBLK TestCode: EPA Method 8015D Mod: Gasoline Range Client ID: Batch ID: G48563 RunNo: 48563 Prep Date: Analysis Date: 1/19/2018 SeqNo: 1561862 Units: mg/Kg Analyte Result SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual

 Gasoline Range Organics (GRO)
 ND
 5.0

 Surr: BFB
 510
 500.0
 101
 70
 130

Oualifiers:

* 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 6 of 6



