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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.

16369 <u>Proposed Alternative Method Per</u>		
or proposed alternative method	k, or proposed alternative method it/or registration an existing permitted or non-permitted pit, below-grade tank	ς,
<i>Instructions: Please submit one application (Form C-144)</i> Please be advised that approval of this request does not relieve the operator of liability environment. Nor does approval relieve the operator of its responsibility to comply w	y should operations result in pollution of surface water, ground water	
Deperator: BP America Production Company	OGRID #: 778 NMOCD	
Address: 200 Energy Court, Farmington, NM 87401		
Facility or well name: BOLACK E 001	MAY 2 2 201	8
0001501100	D Damit Number	
API Number:         3004524103         OCL           U/L or Qtr/Qtr         L         Section         33         Township         28N	Permit Number:	1
Center of Proposed Design: Latitude 36.61538		
Surface Owner: Federal State Private Tribal Trust or Indian Allot		
	inem	
2. Description F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover	* Release Confirmed Additional C-141 Required.	
Permanent Emergency Cavitation P&A Multi-Well Fluid M	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: Lx Wx I	)
3.		
Below-grade tank: Subsection I of 19.15.17.11 NMAC	КВ	
Volume: 45 bbl Type of fluid: Produced Water		
Tank Construction material: Steel		
Secondary containment with leak detection Disible sidewalls, liner, 6-		
□ Visible sidewalls and liner □ Visible sidewalls only ■ Other Single	wall/ double bottom; sidewalls not visible	
Liner type: Thicknessmil 🔲 HDPE 🗌 PVC 🔲 O		
4.		
Alternative Method:		
Submittal of an exception request is required. Exceptions must be submitted to	the Santa Fe Environmental Bureau office for consideration of a	pproval.
5.		
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temp	porary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top ( <i>Required if institution or church</i> )	located within 1000 feet of a permanent residence, school, hospita	al,
Four foot height, four strands of barbed wire evenly spaced between one and	d four feet	
Alternate. Please specify		
		2

5 6.

Netting:	Subsection E	E of 19.15.17.11	NMAC (Applies to p	permanent pits and	permanent open top tanks)
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Screen Netting Other\_

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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

#### Variances 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:

- 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.

#### 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 acceptable 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 □ 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	□ Yes □ No □ NA
<ul> <li>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)</li> <li>Written confirmation or verification from the municipality; Written approval obtained from the municipality</li> </ul>	🗌 Yes 🗌 No
<ul> <li>Within the area overlying a subsurface mine. (Does not apply to below grade tanks)</li> <li>Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division</li> </ul>	Yes No
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	Yes No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	Yes No
Below Grade Tanks	
<ul> <li>Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).</li> <li>Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	🗌 Yes 🗌 No
<ul> <li>Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.</li> <li>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	🗌 Yes 🗌 No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
<ul> <li>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.)</li> <li>Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	🗌 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 300feet 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

<ul> <li>Within 100 feet of a wetland.</li> <li>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	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					
<ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	🗌 Yes 🗌 No					
<ul> <li>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;</li> <li>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	🗌 Yes 🗌 No					
<ul> <li>Within 300 feet of a wetland.</li> <li>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	🗌 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						
<ul> <li>lake (measured from the ordinary high-water mark).</li> <li>Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	Yes No					
<ul> <li>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	🗌 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					
<ul> <li>Within 500 feet of a wetland.</li> <li>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	🗌 Yes 🗌 No					
10.         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 19.15.17.10 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:						
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:						

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, that the documents are attached.							
<ul> <li>Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC</li> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>Climatological Factors Assessment</li> <li>Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC</li> </ul>							
<ul> <li>Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Quality Control/Quality Assurance Construction and Installation Plan</li> <li>Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> </ul>							
<ul> <li>Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan</li> <li>Emergency Response Plan</li> <li>Oil Field Waste Stream Characterization</li> <li>Monitoring and Inspection Plan</li> <li>Erosion Control Plan</li> </ul>							
Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC							
<ul> <li><u>Proposed Closure</u>: 19.15.17.13 NMAC</li> <li><i>Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.</i></li> <li>Type: Drilling Workover Emergency Cavitation P&amp;A Permanent Pit Below-grade Tank Multi-well F</li> <li>Alternative</li> </ul>	luid 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 Alternative Closure Method							
14.         Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must 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 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         Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC							
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	rce material are Please refer to						
<ul> <li>Ground water is less than 25 feet below the bottom of the buried waste.</li> <li>NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</li> </ul>	□ 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						
<ul> <li>Ground water is more than 100 feet below the bottom of the buried waste.</li> <li>NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</li> </ul>	☐ Yes ☐ No ☐ NA						
<ul> <li>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).</li> <li>Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	🗌 Yes 🗌 No						
<ul> <li>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	🗌 Yes 🗌 No						
<ul> <li>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.</li> <li>NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site</li> </ul>	🗌 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							

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<ul> <li>adopted pursuant to NMSA 1978, Section 3-27-3, as amended.</li> <li>Written confirmation or verification from the municipality; Written approval obtained from the municipality</li> </ul>								
	🗌 Yes 🗌 No							
<ul> <li>Within the area overlying a subsurface mine.</li> <li>Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division</li> </ul>	🗌 Yes 🗌 No							
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological</li> </ul>								
Society; Topographic map	🗌 Yes 🗌 No							
Within a 100-year floodplain.     Image: Year State								
16.								
16.       On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.								
17. 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:								
18. <u>OCD Approva</u> l: Permit Application (including closure plan) 🛛 Closure Plan (only) 🖉 OCD Conditions (see attachment)								
1 m								
	3/18							
OCD Representative Signature: Approval Date: 5/2	18							
OCD Representative Signature: Approval Date: 5/20 Title: Environmental Spec. OCD Permit Number:	23/18							
OCD Representative Signature: Approval Date: Title: Environmental Spec. OCD Permit Number: <sup>19.</sup> 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.								
OCD Representative Signature: Approval Date: Title: Environmental Spec. OCD Permit Number: <sup>19.</sup> <u>Closure Report (required within 60 days of closure completion)</u> : 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								
OCD Representative Signature: Approval Date: Title: Environmental Spec. OCD Permit Number: <sup>19.</sup> 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							

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22.		_
<b>Operator Closure</b>	Certification:	

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Erin Garifalos

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Signature:

Title: Field Environmental Coordinator

erin garifalas

Date: May 17, 2018

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

## BOLACK E 001 API No. 3004524103

## Unit Letter L Section 33 T 28N 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

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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.

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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
	45 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	10	< 0.100
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.420
TPH	US EPA Method SW-846 418.1 or 8015 extended	100	4200
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 except TPH. The release will be addressed following the spill and release guidelines. The field report and laboratory reports are attached.

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.

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# Sampling results indicate a release has occurred and will be addressed following the spill and release guidelines. 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 occurred and will be addressed following the spill and release guidelines. 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 will be backfilled and the BGT location's surface condition is clear, but within the site's operational area. The area will be reclaimed with 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 will be backfilled and the BGT location's surface condition is clear, but within the site's operational area. The area will be reclaimed with 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 will be backfilled and the BGT location's surface condition is clear, but within the site's operational area. The area will be reclaimed with 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 will be backfilled and the BGT location's surface condition is clear, but within the site's operational area. The area will be reclaimed with 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 will be backfilled and the BGT location's surface condition is clear, but within the site's operational area. The area will be reclaimed with 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

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- 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.

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

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	ase Notifi	catior	and Co	orrective A	ction	l.					
						<b>OPERA</b>			<ul> <li>Initia</li> </ul>	al Report	Final F	Report		
			tion Compan		Contact Erin Garifalos Telephone No. (832) 609-7048									
Address 20 Facility Nat			armingto	n, NM 8740			e: Natural G							
Surface Ow	mer: Fede	eral		Mineral (	Owner:	Federal			API No	.300452	24103			
						N OF RE	LEASE							
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/V	Vest Line	County				
L	33	28N	08W	1,640	Sou	uth	1,080	We	st	5	San Jua	an		
			Latitud	e 36.61538	L	ongitude1	07.69163	NAD	83					
				NAT	TURE	OF REL	EASE							
Type of Rele	ase:: none	9					Release: unkn			Recovered: :				
Source of Re	belo	w grade ta	nk - 45	bl		Date and F	Hour of Occurrence	ce:	n/a	Hour of Dis	covery:			
Was Immedi	ate Notice (		Yes 🗸	No 🗌 Not R	equired	If YES, To	Whom?							
By Whom?						Date and H								
Was a Water	course Read		Yes 🗸	No		If YES, Vo	olume Impacting	the Wate	ercourse.					
If a Watercon	Iree was Im	pacted, Descr	ibe Fully *	1										
				for Ch will be	lorides,	BTEX, and sed followin	ath the BGT wa TPH below BG <sup>-</sup> g the spill and r	T closur	e standard	ds except 7	PH. The relea	ase		
Describe Are	a Affected	and Cleanup A	Action Tak	<sup>en.*</sup> Final lab	orato	ry analys	is attached							
regulations a public health should their o or the enviro	ll operators or the envir operations h nment. In a	are required t ronment. The nave failed to a	o report an acceptanc adequately OCD accep	d/or file certain e of a C-141 rep investigate and i	elease no ort by the emediate	otifications a e NMOCD m e contaminati	knowledge and u nd perform correc arked as "Final R on that pose a thr te the operator of	ctive act eport" d reat to gr	ions for rele oes not reli ound water	eases which eve the open , surface wa	may endanger rator of liability ater, human heal			
	incia a	aren n					OIL CON	SERV	ATION	DIVISIO	DN			
Signature:	san g	wilfald	14											
		Garifalos				Approved by	Environmental S	pecialist						
		onmenta		rdinator		Approval Da	e:		Expiration I	Date:				
		garifalos				Conditions of				Attached				
Date: May				(832) 609-70	048					Attached				
Attach Addi	tional Shee	ets If Necess	ary	H	-10	A CO -	33768	F						
				TNU	F10	0 373	22168							



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

March 16, 2018

bp

1 6

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: BOLACK E 001 API #: 3004524103

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 March 20, 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:
 jeffcblagg@aol.com; blagg\_niv@yahoo.com; Garifalos, Erin

 Subject:
 BP Pit Close Notification - BOLACK E 001

 Date:
 Friday, March 16, 2018 9:49:50 AM

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>

March 16, 2018

· / •

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

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

BOLACK E 001 API 30-045-24103 (L) Section 33 – T28N – 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 close a 95bbl BGT and a 21bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around March 20, 2018.

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

Sincerely,

Erin Garifalos

BP		G ENGINEERI 37, BLOOMFIEI			API#: 3004524	103
CLIENT:	TANK ID (if applicble):					
FIELD REPORT:	(circle one): BGT CONFIRM	MATION / RELEASE INVESTIG	GATION / OTHER:		PAGE #: 1 0	f <b>1</b>
SITE INFORMATION	SITE NAME: BC	DLACK E #1			DATE STARTED: 03/2	20/18
QUAD/UNIT: L SEC: 33 TWP:	28N RNG: 8W	PM: NM CNT	Y: <b>SJ</b> ST:	NM	DATE FINISHED:	
1/4 -1/4/FOOTAGE: 1,640'S / 1,0		LEASE TYPE: FEDERAL	TRIKE			JV
			P - J. GONZALES			
					GL ELEV.: 6	
1) 45 BGT (SW/DB) - B		36.61538 X 107.				5/E
2)	GPS COORD.:				RING FROM W.H.:	
3)	GPS COORD.:					
	GPS COORD.:	RD(S) # OR LAB USED:		TANCE/BEAP	RING FROM W.H.:	OVM
SAMPLING DATA:	5) - B SAMPLE DATE:		HALL 1315 LAB ANALYSIS:	801	5B/8021B/300.0 (CI)	READING (ppm) 403
	SAMPLE DATE:		LAB ANALYSIS:	001	15D/0021D/300.0 (CI)	403
3) SAMPLE ID:			LAB ANALYSIS:			
4) SAMPLE ID:			LAB ANALYSIS:			
		SAMPLE TIME:	LAB ANALYSIS:			
SOIL DESCRIPTION						
COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY	IVE GRAY				OHESIVE / MEDIUM PLASTIC / HIGH STIFF / VERY STIFF / HARD	LY PLASTIC
CONSISTENCY (NON COHESIVE SOILS): LC					OLORED SOILS & BEDRO	ск
MOISTURE: DRY/SLIGHTLY MOIST (MOIST) W						
SAMPLE TYPE: GRAB (COMPOSITE) # DISCOLORATION/STAINING OBSERVED: YES N				EXPLAN	ATION - BENEATH BGT, UN	KNOWN ORIGIN
SITE OBSERVATION	and the second se			<u>ст</u>		UNUN
APPARENT EVIDENCE OF A RELEASE OBSERVE					DROCARBON ODOR.	
EQUIPMENT SET OVER RECLAIMED AREA:	YES NO EXPLANATION -					
OTHER: NMOCD OR BLM REPS. NOT PF COLLECTED FROM BEDROCK SURF			45 BGT ACTUAL CO	NSTRUC	TION; SW/DB. SAMPLE	
EXCAVATION DIMENSION ESTIMATION:		ft. X	ft. EXCAVAT	ION EST	IMATION (Cubic Yards) :	
	EAREST WATER SOURCE:	>1,000' NEAREST SURFA	CE WATER: <1,000'	NMOC	D TPH CLOSURE STD: 1,0	00ppm
SITE SKETCH	BGT Located : off	on site PLOT PL	AN circle: attache	d OVM	CALIB. READ. = <b>100.0</b> pp	m RF =1.00
					CALIB. GAS = <b>100</b> pp	m
			N	TIME:	am/pm DATE:0	3/20/18
	TO W.H.				MISCELL. NOT	<b>TES</b>
	STEEL			w	Ю:	
CON	TAINMENT RING			R	EF #: <b>P-960</b>	
	*				D: VHIXONEV11	
		PROD.			J #:	
	PBGTL	TANK		_	ermit date(s): 06/14	
	T.B. ~ 5' $\xrightarrow{x \times x}$ B.G.			Tan		
	u.u.			B	ppm = parts per million BGT Sidewalls Visible: Y /	N)
			VCD	-	BGT Sidewalls Visible: Y /	
NOTES: BGT = BELOWAGRADE TANK; E.D. = EXCAVATIO	N DEPRESSION' B.G. = BELOWGR	ADE: B = BELOW TH = TEST HOLE	X - S.P.		BGT Sidewalls Visible: Y /	N
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BEL APPLICABLE OR NOT AVAILABLE; SW - SINGLE	OW-GRADE TANK LOCATION; SPD = E WALL; DW - DOUBLE WALL; SB - SI	SAMPLE POINT DESIGNATION; R.W INGLE BOTTOM; DB - DOUBLE BOTT	I = RETAINING WALL; NA - NOT		agnetic declination: 10	°Е
NOTES: GOOGLE EARTH IMAGE	ERY DATE: 10/5/2016	ONSITE	03/20/18			

С	hain-o	of-Cus	stody Record	Turn-Around 1	ime:	SAME	١.						F		/TE	20				AL
Client:	lient: BLAGG ENGR. / BP AMERICA			Standard	Rush	DAY )														RY
																ntal				N I
Mailing A	Mailing Address: P.O. BOX 87				BOLACK E	# 1		40/	01 LI											
			FIELD, NM 87413	Project #:	DOLITON L													7109		
Dhana #		(505) 63						Te	1. 50	)5-34	15-3			Fax 505-345-4107 malysis Request						
Phone #: email or F	ax#:	(505) 05		Project Manag	ler:								unar	y 313	INCO	lucs				
QA/QC Pa									6					504)	3'S			- 300.1)		
✓ Stand			Level 4 (Full Validation)		ERIN GARI	FALOS	(8021B)	+ TPH (Gas only)	MRO)			1S)		04,5	PCB's			er - 3		e
Accreditat	tion:			Sampler:	NELSON VI	ELEZ	<sup>∞</sup>	(Gas	DRO /	F	F	SIN		102,	8082			/ wat		dm
		□ Other		On Ice:	X Yes	10 No 77 V		HdT		418	504	827(	5	O <sub>3</sub> ,N			(A)	00.00		e sa
	Гуре)	T		Sample Temp	erature;			3E +	(GR(	por	por	or	etal	CI'N	icide	A)	i-VC	oil - 3	a	osit
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No:	BTEX + MH	BTEX + MTBE	TPH 8015B (GRO	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	<b>RCRA 8 Metals</b>	Anions (F,Cl,NO <sub>3</sub> ,NO <sub>2</sub> ,PO <sub>4</sub> ,SO <sub>4</sub> )	8081 Pesticides	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water	Grah cample	pt.
2/10				MENHKit		1803841	E	81	E	F	H	4	RC	Ar	8	82	83	5	Ū	2 10
1-70	1300	SOIL		4 02. 1	Cool	201			~			_						-		1
2/1/-																			_	
3/26/18	1315	SOIL	5PC-TB@ 5' (45)-B	4 oz 1	Cool	202	V		٧			_						V		V
																-				
Date: 3/20/18	Time:	Relinquish	the y	Received by:	her	Date Time 3ho/18/1720		ONTA		& REF	EREN	CE # \	WHEN	APP	LICAL	BLE;		ЛТН СО	RRESP	ONDING
Date:	Time:	Relinquish	ed by:	Received by:		Date Time		1	VID:	VHD	ONE	V11								
5/20/18 1851 / ht Walts		r Un.	n-h	13/2/1/8	Ret	feren	ce #	-	P - 9	960	-									

# QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client:Blagg EngineeringProject:BOLACK E 1

5						
Sample ID MB-37158	SampType: mblk	TestCode: EPA Method				
Client ID: PBS	Batch ID: 37158	RunNo: 49959				
Prep Date: 3/21/2018	Analysis Date: 3/21/2018	SeqNo: 1618491	Units: mg/Kg			
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual		
Chloride	ND 1.5					
Sample ID LCS-37158	SampType: Ics TestCode: EPA Method 300.0: Anions					
Client ID: LCSS	Batch ID: 37158	RunNo: 49959				
Prep Date: 3/21/2018	Analysis Date: 3/21/2018	SeqNo: 1618492	Units: mg/Kg			
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual		
Chloride	14 1.5 15.00	0 91.7 90	110			

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 3 of 6

WO#: **1803B41** 

22-Mar-18

# QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1803B41

22-Mar-18

Client: Blagg E Project: BOLAC	Engineering CK E 1									
Sample ID LCS-37148	SampTy	ype: LC	s	Tes	tCode: El	PA Method	8015M/D: Di	esel Rang	e Organics	
Client ID: LCSS	Batch	ID: 37	148	F	RunNo: 4	9954				
Prep Date: 3/21/2018	Analysis Da	ate: 3/	21/2018	5	SeqNo: 1	617422	Units: mg/k	٢g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	10	50.00	0	93.7	70	130			
Surr: DNOP	4.3		5.000		85.4	70	130			
Sample ID MB-37148	SampTy	pe: ME	BLK	Tes	tCode: El	PA Method	8015M/D: Di	esel Rang	e Organics	
Client ID: PBS	Batch	ID: 37	148	F	RunNo: 4	9954				
Prep Date: 3/21/2018	Analysis Da	ate: 3/	21/2018	S	SeqNo: 1	617423	Units: mg/k	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	9.8		10.00		98.0	70	130			

#### 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 4 of 6

## QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: Blagg Engineering Project: BOLACK E 1

Sample ID RB	SampType: MBLK TestCode: EPA Method					8021B: Volat	tiles				
Client ID: PBS	Batc	Batch ID: B49962 RunNo: 49962			9962						
Prep Date:	Analysis Date: 3/21/2018			S	eqNo: 1	618155	Units: mg/K	g/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	ND	0.025									
Toluene	ND	0.050									
Ethylbenzene	ND	0.050									
Xylenes, Total	ND	0.10									
Surr: 4-Bromofluorobenzene	0.89		1.000		89.0	80	120				
Sample ID 100NG BTEX LCS	CS SampType: LCS TestCode: EPA Method 8021B: Volatiles										
Client ID: LCSS	Batch ID: <b>B49962</b> RunNo: <b>49962</b>										
Prep Date:	Analysis [	Date: 3/	21/2018	SeqNo: 1618156			Units: mg/K	g			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	0.94	0.025	1.000	0	94.0	77.3	128				
Toluene	0.95	0.050	1.000	0	95.2	79.2	125				
Ethylbenzene	0.95	0.050	1.000	0	95.2	80.7	127				
Xylenes, Total	2.9	0.10	3.000	0	97.9	81.6	129				
Surr: 4-Bromofluorobenzene	0.93		1.000		92.7	80	120				

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

WO#: 1803B41

22-Mar-18

Page 6 of 6

HALL ENVIRONMENTAL ANALYSIS LABORATORY	TEL: 505-345-3	ntal Analysis Laborat 4901 Hawkins Albuquerque, NM 87 1975 FAX: 505-345-4 v.hallenvironmental.e	NE 109 San 107	Sample Log-In Check List					
Client Name: BLAGG	Work Order Num	ber: 1803B41		RcptNo:	1				
			n na						
Received By: Anne Thorne	3/21/2018 7:00:00		Anne Ha	-					
Completed By: Anne Thorne	3/21/2018 7:26:30	AM	ame the						
Reviewed By: KL 3/21/16	·								
Chain of Custody									
1. Is Chain of Custody complete?		Yes 🗹	No 🗋	Not Present					
2. How was the sample delivered?		Courier							
Log In									
3. Was an attempt made to cool the sample	s?	Yes 🔽	No	NA 🗌					
4. Were all samples received at a temperatu	ire of >0° C to 6.0°C	Yes 🗹	No 🗌	NA 🗌					
5. Sample(s) In proper container(s)?		Yes 🔽	No 🗌						
6. Sufficient sample volume for indicated tes	it(s)?	Yes 🗹	No 🗌						
7. Are samples (except VOA and ONG) prop	erly preserved?	Yes 🗹	No 🗌						
8. Was preservative added to bottles?		Yes	No 🗹	NA 🗌					
9. VOA vials have zero headspace?		Yes	No 🗆	No VOA Vials 🗹					
10. Were any sample containers received bro	oken?	Yes	No 🗹	# of preserved					
11. Does paperwork match bottle labels?		Yes 🗹	No 🗆	bottles checked for pH:					
(Note discrepancies on chain of custody)			-	100 March 100 March 100	>12 unless noted)				
12. Are matrices correctly identified on Chain	of Custody?	Yes 🗹	No 🛄	Adjusted?					
13. Is it clear what analyses were requested?		Yes 🗹	No 🗌	Charlesd by					
14. Were all holding times able to be met? (If no, notify customer for authorization.)		Yes 🗹	No	Checked by:					
Special Handling (if applicable)									
15. Was client notified of all discrepancies wi	th this order?	Yes	No	NA 🗹					
Person Notified:	Date								
By Whom:	Via:	•	one 🗌 Fax	in Person					
Regarding:	n montenen and an and the Balladeleters energy to provide Labor								
Client Instructions:	AND THE REAL PROPERTY OF THE PARTY OF THE PA								
16. Additional remarks:									
17. <u>Cooler Information</u>									
Cooler No Temp °C Condition	Seal Intact Seal No	Seal Date S	Signed By						
1 1.0 Good	les								



