

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

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

## Release Notification and Corrective Action

### OPERATOR

☒ Site Assessment ☐ Final Report

Name of Company BP America Production Company	Contact Steve Moskal
Address 380 Airport Road, Suite A, Durango, CO 81303	Telephone No. (505) 330-9179
Facility Name GALLEGOS CANYON UNIT 004	Facility Type Natural Gas Well

Surface Owner Private	Mineral Owner Federal	API No. 3004507045
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### LOCATION OF RELEASE

Unit Letter G	Section 34	Township 28N	Range 12W	Feet from the 1,650	North/South Line North	Feet From The 1,650	East/West Line East	County San Juan
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Latitude 36.62140 Longitude -108.09608

### NATURE OF RELEASE



Type of Release Wellstream Fluids	Volume of Release N/A	Volume Recovered N/A
Source of Release Below-grade Tank (BGT)	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* During closure activities, impacts were identified beneath the 95 bbl BGT. Lab analysis confirmed the impacts are above the BGT permit and 19.15.29 NMAC closure standards for groundwater <50 feet (ft.). The impacts are primarily motor oil range organics and likely not readily mobilized in soil. BP plans to assess the vertical extent of impacts via hand auger as close to the bgt center as possible. The lateral extent will be placed as close to the BGT perimeter in the four cardinal directions (see attached Site Map). Soil sampling will adhere to subparagraph d of Paragraph 5 of Subsection A of 19.15.29.11 NMAC.

Describe Area Affected and Cleanup Action Taken.\* Upon receiving the final laboratory results of the proposed site assessment, BP will make available the findings to all appropriate regulatory agencies involved and the surface owner of record. Attached is a proposed workplan to perform the Site Assessment Activity via hand augering and to determine if remediation of the impacts is required. In accordance with Subsection B of 19.15.29.11 NMAC, a remediation plan will be developed to address both the impacts and the timing of the cleanup effort, if any, within an active center pivot irrigated crop circle operated by the Navajo Agricultural Industry (NAPI).

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: <u>8/28/2018</u>	Expiration Date:
E-mail Address: steven.moskal@bpx.com	Conditions of Approval: <u>Site Characterization</u>	Attached <input type="checkbox"/>
Date: August 22, 2018	Phone: (505) 330-9179	<u>Due 9/25/2018</u>

\* Attach Additional Sheets If Necessary

NMOCD

AUG 22 2018

DISTRICT III

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## **BP Site Assessment/Delineation Plan**

To: Cory Smith, Vanessa Fields(NMOCD)

From: Steve Moskal (BP)

CC: Jeff Blagg (Blagg Engineering)

Date: 8/22/2018

Re: GALLEGOS CANYON UNIT No. 004-Soil Delineation –(G) Sec. 34, T28N, R12W; API #30-045-07045;

Dear Mr. Smith, Mrs. Fields

The Gallegos Canyon Unit (GCU) 004 gas well located within the San Juan Basin Gas Field in San Juan County, New Mexico. The site is located on private land with federal mineral managed Bureau of Land Management Farmington Field Office (BLM-FFO).

### **BACKGROUND**

Historical impacts were identified at the location on June 25, 2018 when the final laboratory report was furnished to BP from the closure of a below grade tank (BGT). The impacts are likely the result of a tank overflow at the location. Site assessment requirements from 19.15.29 NMAC to determine lateral & vertical extents of impacts is proposed. The well site is operated by BP Production.

### **SITE RANKING**

Following 19.15.29 NMAC, the site closure standard is 600 mg/Kg chloride, 100 ppm TPH, 50 ppm BTEX and 10 ppm benzene:

- Depth to groundwater: estimated between 12-16 feet below grade.
- Distance to the nearest Wellhead Protection Area: none identified within a half mile radius
- Distance to nearest Significant Watercourse: none identified within a half mile radius (agricultural developed area)

### **PROPOSED REMEDIATION – HAND AUGER DELINEATION**

The site will be delineated via hand auger within the BGT footprint to determine the vertical extent of impacts as well as four (4) additional borings adjacent to the BGT's perimeter to address the lateral extent.

The hand augering will be performed manually using a stainless steel auger to collect soil samples at five (5) separate points at the site, as depicted on the attached figure. The sampling will conform to subparagraph d of Paragraph 5 of Subsection A of 19.15.29.11 NMAC. At a minimum, two (2) soil samples will be collected from each boring; one from the highest field screening interval or visual impacts and one at the total depth of the boring. Samples will be collected and placed into laboratory supplied 4-ounce glass jars, stored in an ice chest with ice and hand delivered to a nationally accredited environmental laboratory for analysis of Total Petroleum Hydrocarbons (C6-C36), BTEX, and chlorides via EPA approved methods 8015, 8021/8260 and 300.0 respectively.

### **SITE CLOSURE AND REPORTING**

Once the final laboratory report is received, BP will discuss with the NMOCD and the private landowner the investigative findings to determine if remediation is necessary and to what extent. In accordance with Subsection B of 19.15.29.11 NMAC, a remediation plan will be developed to address both the impacts and the timing of cleanup effort, if any, within an active center pivot irrigated crop circle operated by the Navajo Agricultural Industry (NAPI). A final report will delivered to NMOCD for review of investigative activities within 60 days.



Steve Moskal

BP – Field Environmental Coordinator



**OR**  
**505-947-9900**

**BP AMERICA PRODUCTION COMPANY**  
**GALLEGOS CANYON UNIT 004**  
**API 3004507045 LEASE NMSF078903A**  
**1650 FNL 1650 FEL (G) SEC 34 T28N R12W**  
**San Juan County ELEV 5878**  
**LAT 36° 37' 17.256"**  
**LONG 108° 5' 42.432"**





## BP - GCU 186 & 004

Imagery date: 3/15/2015

GCU 004 WH GPS Coord.: 36.621296,-108.095822

GCU 186 WH GPS Coord.: 36.615473,-108.110930

**GCU 185**

### GCU 185 Depth To Water

Jan. 2015 - ~5.25 ft. below grade  
GL Elevation - 5,667 ft.

**GCU 004**

GL Elevation - 5,878 ft.

**GCU 4**

**GCU 186**

GL Elevation - 5,786 ft.

**GCU 186**

**GCU 204E**

### GCU 204E Depth To Water

May 2016 - ~13 ft. below grade  
June 2012 - ~16 ft. below grade  
GL Elevation - 5,878 ft.

Google Earth

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3000 ft



## BP - GCU 004

(G) Section 34, T28N, R12W  
API #: 3004507045

Imagery date: 3/15/2015  
WH GPS Coord.: 36.621296,-108.095822

Approximate locations of  
Hand augering advancements

WH

Google Earth

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60 ft

