Form C-144 Revised April 3, 2017

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

Type of action:

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Below grade tank registration

Closure of a Modification	oit or proposed alternative method pit, below-grade tank, or proposed alternative method n to an existing permit/or registration only submitted for an existing permitted or non-permitted pit, below-grade tank,
Instructions: Please submit one appli	lication (Form C-144) per individual pit, below-grade tank or alternative request
	re the operator of liability should operations result in pollution of surface water, ground water or the sponsibility 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 87	
Facility or well name: GCU 066	
API Number: 3004507691	OCD Permit Number:
U/L or Qtr/Qtr G Section 35	OCD Permit Number:
Center of Proposed Design: Latitude 36.68461	Longitude -108.17309 NAD83
Surface Owner: Federal State Private Triba	al Trust or Indian Allotment
Lined Unlined Liner type: Thickness String-Reinforced Liner Seams: Welded Factory Other 3. Below-grade tank: Subsection I of 19.15.17.11 NN Volume: 95 bbl Type of fluid: Tank Construction material: Steel Secondary containment with leak detection Vis Visible sidewalls and liner Visible sidewalls on	
4.	
Alternative Method: Submittal of an exception request is required. Exception	ns must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
5.	
	to permanent pits, temporary pits, and below-grade tanks) wire at top (Required if located within 1000 feet of a permanent residence, school, hospital,
Four foot height, four strands of barbed wire evenly s	spaced between one and four feet
Alternate. Please specify	NMOCD



-				
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				
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.	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.			
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 are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source			
General siting				
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No			
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			
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality				
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 				
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map				
Below Grade Tanks				
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site				
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)				
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No			
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image				
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 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			

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Temporary Pit Non-low chloride drilling fluid			
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No		
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Permanent Pit or Multi-Well Fluid Management Pit			
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No		
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No		
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
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			
II.			
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 documents are 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 19.15.17.9 NMAC and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.10 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. 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 H₂S, Prevention Plan □ Emergency Response Plan □ Characteristics 			
 □ Oil Field Waste Stream Characterization □ Monitoring and Inspection Plan □ Erosion Control Plan □ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC 			
13.			
<u>Proposed Closure</u> : 19.15.17.13 NMAC <u>Instructions</u> : Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.			
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-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)	luid Management Pit		
☐ In-place Burial ☐ On-site Trench Burial ☐ Alternative Closure Method			
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			
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.			
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 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 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			
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			
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 Yes N			
Within incorporated municipal boundaries or within a defined municipal frach water well field covered under a municipal ordinance			

- 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				
 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. Please indicate, 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 19.15.17.11 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC 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 be achieved) 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				
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	ief.			
Name (Print): Title:				
Signature: Date:				
e-mail address: Telephone:				
e-mail address:				
18.	115018			
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	115018			
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date:	the closure report.			
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 1011 Title: 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. complete this			

22.				
Operator Closure 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.				
Fria Duranca				
Name (Print): Erin Dunman	Title:			
Erin Dunman				
Signature:	Date:			
e-mail address: erin.dunman@bpx.com	Telephone:			

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

GCU 066

API No. 3004507691

Unit Letter G Section 35 T 29N R 13W

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	< 0.020
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	< 0.081
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 BGT location's surface condition is clear, but within the site's operational area. 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 BGT location's surface condition is clear, but within the site's operational area. 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 BGT location's surface condition is clear, but within the site's operational area. 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 BGT location's surface condition is clear, but within the site's operational area. 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 BGT location's surface condition is clear, but within the site's operational area. 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.

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

Responsible Party BP America Production Company

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

OGRID 778

Contact Name Erin Dunman		Contact Te	elephone 832-609-7048		
Contact email erin.dunman@bpx.com			Incident #	(assigned by OCD)	
Contact mailing address 200 Energy Court, Farmington, NM 87401					
Location of Release Source Latitude 36.68461 Longitude -108.17309 (NAD 83 in decimal degrees to 5 decimal places)					
Site Name GCU 066					
Date Release Discovered			API# (if app		
Unit Letter Section	Township	Range	Coun	•	
G 35	29N	13W	San J	Juan	
Surface Owner: State Federal Tribal Private (Name:) Nature and Volume of Release Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below) Crude Oil Volume Released (bbls) Volume Recovered (bbls)					
Produced Water	Volume Release			Volume Recovered (bbls)	
	Is the concentration of total dissolved solids (TI in the produced water >10,000 mg/l?			☐ Yes ☐ No	
Condensate	Volume Release			Volume Recovered (bbls)	
☐ Natural Gas	Gas Volume Released (Mcf)			Volume Recovered (Mcf)	
Other (describe)	r (describe) Volume/Weight Released (provide units)		Volume/Weight Recovered (provide units)		
Cause of Release No release. This is for BGT closure.					

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by	If YES, for what reason(s) does the responsib	ble party consider this a major release?		
19.15.29.7(A) NMAC?				
☐ Yes ☐ No				
If YES, was immediate no	otice given to the OCD? By whom? To whon	n? When and by what means (phone, email, etc)?		
	Initial Res	ponse		
The responsible p	party must undertake the following actions immediately un	nless they could create a safety hazard that would result in injury		
The source of the rele	ease has been stopped.			
☐ The impacted area ha	is been secured to protect human health and the	e environment.		
Released materials ha	ave been contained via the use of berms or dike	es, absorbent pads, or other containment devices.		
All free liquids and re	ecoverable materials have been removed and n	nanaged appropriately.		
If all the actions described	d above have <u>not</u> been undertaken, explain wh	y:		
Per 19.15.29.8 B. (4) NM	AC the responsible party may commence rem	ediation immediately after discovery of a release. If remediation		
		orts have been successfully completed or if the release occurred ase attach all information needed for closure evaluation.		
		t of my knowledge and understand that pursuant to OCD rules and		
public health or the environn	ment. The acceptance of a C-141 report by the OCI	ations and perform corrective actions for releases which may endanger D does not relieve the operator of liability should their operations have		
failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.				
Printed Name: Title:				
Signature:		Date:		
email:		Telephone:		
OCD Only				
Received by:	D	Date:		
-J.				

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	(ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release 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?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☐ No
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vert contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	cical extents of soil
Characterization Report Checklist: Each of the following items must be included in the report.	
Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Data table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release Boring or excavation logs Photographs including date and GIS information Topographic/Aerial maps Laboratory data including chain of custody	S.

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.							
Printed Name:	Title:						
Signature:	Date:						
email:	Telephone:						
OCD Only							
Received by:	Date:						

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must b	e included in the plan.
□ Detailed description of proposed remediation technique □ Scaled sitemap with GPS coordinates showing delineation poin □ Estimated volume of material to be remediated □ Closure criteria is to Table 1 specifications subject to 19.15.29. □ Proposed schedule for remediation (note if remediation plan times)	12(C)(4) NMAC
Deferral Requests Only: Each of the following items must be con-	afirmed as part of any request for deferral of remediation
Deterral Requests Only. Each of the following tiens must be con	ignimed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around predeconstruction.	roduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human health	n, the environment, or groundwater.
	e and remediate contamination that pose a threat to groundwater, acceptance of a C-141 report does not relieve the operator of
Printed Name:	Title:
Signature:	Date:
email:	Telephone:
OCD Only	
Received by:	Date:
Approved Approved with Attached Conditions of	Approval
Signature:	Date:

State of New Mexico Oil Conservation Division

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

A scaled site and sampling diagram as described in 19.15.29.1	11 NMAC							
Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)								
Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)								
Description of remediation activities								
and regulations all operators are required to report and/or file certai may endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and rer human health or the environment. In addition, OCD acceptance of compliance with any other federal, state, or local laws and/or regular restore, reclaim, and re-vegetate the impacted surface area to the coaccordance with 19.15.29.13 NMAC including notification to the Operation Name:	ations. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in							
OCD Only								
Received by:	Date:							
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.							
Closure Approved by:	Date:							
Printed Name:	Title:							

bp



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

June 22, 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: GALLEGOS CANYON UNIT 066 API# - 3004507691

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 June 26, 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

Erin Dunman

From:

Farrah Buckley

Sent:

Friday, June 22, 2018 12:26 PM

To:

Buckley, Farrah (CH2M HILL); Smith, Cory, EMNRD; Fields, Vanessa, EMNRD

(Vanessa.Fields@state.nm.us)

Cc:

jeffcblagg@aol.com; blagg_njv@yahoo.com; Erin Garifalos

Subject:

BP Pit Close Notification - GCU 066

external-email:

0

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

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

June 22, 2018

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

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

GALLEGOS CANYON UNIT 066 API# 30-045-07691 (G) Section 35 – T29N – R13W San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 95bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around June 26, 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

Note new email address - Farrah.buckley@bpx.com

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	P.O. BOX 87, BI	NGINEERING, INC. LOOMFIELD, NM 8741 5) 632-1199	3	API #: 3004507691 TANK ID (if applicble): A				
FIELD REPORT:								
SITE INFORMATION		DATE STARTED: 06/26/18						
QUAD/UNIT: G SEC: 35 TWP:	NM	DATE FINISHED:						
1/4 -1/4/FOOTAGE: 1,970'N / 1,8	29N RNG: 13W PM:	NM CNTY: SJ ST: YPE: FEDERAL/STATE/FEE/INI						
		STRIKE ONTRACTOR: BP - J. GONZALES		ENVIRONMENTAL SPECIALIST(S): NJV				
REFERENCE POINT		COORD.: 36.68458 X 108.		GL ELEV.: 5,792'				
95 BGT (SW/SB)		.68461 X 108.17309	STANCE/BEAF	RING FROM W.H.: 71', N73.5W				
2)	GPS COORD.:	D	STANCE/BEAF	RING FROM W.H.:				
3)	GPS COORD.:			RING FROM W.H.:				
	GPS COORD.:	D	STANCE/BEAF	RING FROM W.H.:				
SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # O	R LAB USED: HALL		READING (ppm)				
1) SAMPLE ID: 5PC - TB @ 6'				5B/8021B/300.0 (CI) NA 5B/8021B/300.0 (CI) NA				
2) SAMPLE ID: ESW @ 4' (9	5) SAMPLE DATE: 06/26/	18	001	5B/8021B/300.0 (CI) NA				
4) SAMPLE ID:		SAMPLE TIME: LAB ANALYSIS:						
5) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:						
SOIL DESCRIPTION	SOIL TYPE SAND SILTY SAND S	ILT / SILTY CLAY (CLAY) GRAVEL / OTHER						
SOIL COLOR: MOSTLY DARK YELLOW COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY (SLIGHTLY MOIST) MOIST / W SAMPLE TYPE: GRAB COMPOSITE + DISCOLORATION/STAINING OBSERVED: YES	Y COHESIVE / COHESIVE / HIGHLY COHESIVE DOSE (FIRM) DENSE / VERY DENSE ET / SATURATED / SUPER SATURATED # OF PTS5	PLASTICITY (CLAYS): NON PLASTIC SLIGHTLY: DENSITY (COHESIVE CLAYS & SILTS): SOF HC ODOR DETECTED: YES NO EXPLANATIO ANY AREAS DISPLAYING WETNESS: YES N	T (FIRM)(STIFF VERY STIFF / HARD				
SITE OBSERVATION		VES NO EVEL ANATION						
APPARENT EVIDENCE OF A RELEASE OBSERVE EQUIPMENT SET OVER RECLAIMED AREA: OTHER: NMOCD REP. PRESENT TO WIT DIRECTLY BENEATH BGT, MOST LIKE EXCAVATION DIMENSION ESTIMATION:	DAND/OR OCCURRED: YES NO EXPLAYES NO EXPLANATION - NESS CONFIRMATION SAMPLING ELY DEVELOPED BY RUN ON. SL	. BGT - 15 FT. DIAMETER, LOW PROFIGHTLY DARKER SHADE OF SOIL OB. ft. X NA ft. EXCAVA	SERVED (
SITE SKETCH	BGT Located: off on site	PLOT PLAN circle: attach	ed OM	CALIB. READ. = NA ppm RE = 1.00				
	BERM		OWN TIME:	CALIB. GAS = NA ppm NA am/pm DATE: NA MISCELL. NOTES TO: EF #: P-986				
B.G.	FENCE	<u> </u>		D: VHIXONEVB2 J#:				
METER RUN	ESW S.P.D. (GRAB)	w.H. ⊕	OC Tan ID A					
APPLICABLE OR NOT AVAILABLE; SW - SINGLE	OW-GRADE TANK LOCATION; SPD = SAMPLE PC E WALL; DW - DOUBLE WALL; SB - SINGLE BOTT	LOW, T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL H DINT DESIGNATION; R.W. = RETAINING WALL; NA - NC OM; DB - DOUBLE BOTTOM.	EAD;	BGT Sidewalls Visible: Y / N agnetic declination: 10° E				
NOTES: GOOGLE EARTH IMAGE	ERY DATE: 2018 GOOGLE.	ONSITE: 06/26/18						

Analytical Report

Lab Order 1806F83

Date Reported: 6/29/2018

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Project: GCU 66

1806F83-001 Lab ID:

Client Sample ID: 5PC-TB @ 6' (95)

Collection Date: 6/26/2018 8:20:00 AM

Received Date: 6/27/2018 7:55:00 AM

Analyses	Result	PQL	Qual Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS					Analyst	MRA
Chloride	ND	30	mg/Kg	20	6/27/2018 12:09:59 PM	38916
EPA METHOD 8015M/D: DIESEL RANGE ORGA	ANICS				Analyst	TOM
Diesel Range Organics (DRO)	ND	9.4	mg/Kg	1	6/27/2018 10:26:09 AM	38909
Motor Oil Range Organics (MRO)	ND	47	mg/Kg	1	6/27/2018 10:26:09 AM	38909
Surr: DNOP	78.6	70-130	%Rec	1	6/27/2018 10:26:09 AM	38909
EPA METHOD 8015D: GASOLINE RANGE					Analyst:	NSB
Gasoline Range Organics (GRO)	ND	4.1	mg/Kg	1	6/27/2018 10:17:20 AM	G52273
Surr: BFB	88.2	15-316	%Rec	1	6/27/2018 10:17:20 AM	G52273
EPA METHOD 8021B: VOLATILES					Analyst:	NSB
Benzene	ND	0.020	mg/Kg	1	6/27/2018 10:17:20 AM	B52273
Toluene	ND	0.041	mg/Kg	1	6/27/2018 10:17:20 AM	B52273
Ethylbenzene	ND	0.041	mg/Kg	1	6/27/2018 10:17:20 AM	B52273
Xylenes, Total	ND	0.081	mg/Kg	1	6/27/2018 10:17:20 AM	B52273
Surr: 4-Bromofluorobenzene	103	80-120	%Rec	1	6/27/2018 10:17:20 AM	B52273

Matrix: SOIL

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- J
- Analyte detected below quantitation limits Page 1 of 5
- P Sample pH Not In Range
- RL Reporting Detection Limit
- Sample container temperature is out of limit as specified

Analytical Report

Lab Order 1806F85

Date Reported: 6/29/2018

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Project: GCU 66

1806F85-001 Lab ID:

Client Sample ID: ESW @ 4' (95)

Collection Date: 6/26/2018 8:25:00 AM

Received Date: 6/27/2018 7:55:00 AM

Analyses	Result	PQL	Qual Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS					Analyst	MRA
Chloride	81	30	mg/Kg	20	6/27/2018 12:22:23 PM	38916
EPA METHOD 8015M/D: DIESEL RANGE ORG	ANICS				Analyst	TOM
Diesel Range Organics (DRO)	ND	9.8	mg/Kg	1	6/27/2018 10:48:10 AM	38909
Motor Oil Range Organics (MRO)	ND	49	mg/Kg	1	6/27/2018 10:48:10 AM	38909
Surr: DNOP	94.0	70-130	%Rec	1	6/27/2018 10:48:10 AM	38909
EPA METHOD 8015D: GASOLINE RANGE					Analyst	NSB
Gasoline Range Organics (GRO)	ND	3.8	mg/Kg	1	6/27/2018 10:40:40 AM	G52273
Surr: BFB	78.4	15-316	%Rec	1	6/27/2018 10:40:40 AM	G52273
EPA METHOD 8021B: VOLATILES					Analyst:	NSB
Benzene	ND	0.019	mg/Kg	1	6/27/2018 10:40:40 AM	B52273
Toluene	ND	0.038	mg/Kg	1	6/27/2018 10:40:40 AM	B52273
Ethylbenzene	ND	0.038	mg/Kg	1	6/27/2018 10:40:40 AM	B52273
Xylenes, Total	ND	0.075	mg/Kg	1	6/27/2018 10:40:40 AM	B52273
Surr: 4-Bromofluorobenzene	101	80-120	%Rec	1	6/27/2018 10:40:40 AM	B52273

Matrix: SOIL

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
- % Recovery outside of range due to dilution or matrix
- Analyte detected in the associated Method Blank
- E Value above quantitation range
- Analyte detected below quantitation limits Page 1 of 5 J

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

Chain-of-Custody Record		Turn-Around T	ime:	SAME				1	IAI			NV	TE	20	MR	AF	NT	CAI	ı			
Client:	BLAG	G ENGR.	/ BP AMERICA	☐ Standard	☑ Rush _	DAY													ATC			
				Project Name:			www.hallenvironmental.com															
Mailing A	ddress:	P.O. BO	X 87	GCU # 66			4901 Hawkins NE - Albuquerque, NM 87109															
		BLOOM	FIELD, NM 87413	Project #:			Tel. 505-345-3975 Fax 505-345-4107															
Phone #:		(505) 63	2-1199	,			Analysis Request															
email or F	ax#:			Project Manager:									÷				1)	T				
QA/QC Pad	_		Level 4 (Full Validation)	ERIN GARIFALOS		(8021B)	only)	MRO)			(S)		05'70	PCB's			er - 300.			a)	İ	
Accreditat	ion:		······································	Sampler: NELSON VELEZ)8) ≤	(Gas	RO/	1)	1	SIN		102,1	3082			wat			mpl		
□ NELAP)	□ Other		On ice: ∇Yes □ No □ 1/1/1		1	TPH	0/D	418.	504.	3270		03,N	3/5		(A)	0.00			e sa	2 Z	
□ EDD (1	ype)			Sample Temp	erature: 🗚 🦞		1	¥ + 3E	(GRC	pou	por	or	etals	CI,N	cide	(A)	i-VC	II		e e	osit	(70
Date	Time	Matrix	Sample Request ID	Container Type and # Mother	Preservative Type	HEAL No.	BTEX +-MT	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	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 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water - 300.1)		Grab sample	5 pt. composite sample	Air Bubbles (Y or N)
6/26/18	0820	SOIL	5PC-TB@ 6' (95)	4 oz 1	Cool	701	٧		٧									٧			٧	
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email or F	ax#:			Project Manag	jer:					T			- 10	~				1)				
QA/QC Pa	_	Г	Level 4 (Full Validation)		ERIN GARI	FALOS	(8021B)	(ylu	MRO)					04°20	PCB's			r - 300.1)				
Accreditat	***************************************		Level + (I dil validation)	Sampler:	NELSON V	FI F7	(80	(Gas only)	_			MIS)2,P(382			wate		1	ple	
□ NELAF		□ Other		On Ices			FMB) Hd	/ DR	18.1	04.1	270		3,NC	/ 80		7	0.0			san	ŝ
□ EDD (1				Anions (F,CI,NO3,NO2,PO4,SO4) Grab sample Coloride (soil - 300.0 / water - 300.1)				site	Yor													
Date	Time	Matrix	Sample Request ID	Type and #	1		BTEX +-MTBI	BTEX + MTBE	TPH 8015B (TPH (Metho	EDB (Metho	PAH (8310	RCRA 8 Met	Anions (F,C	8081 Pestic	8260B (VO/	8270 (Semi	Chloride (soil		Grab sampl	# pt. composite sample	Air Bubbles (Y or N)
6/26/18	0825	SOIL	ESW C4' (95)	402-1	Cool	-001			V									\checkmark		1		
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							П	7		1	\dashv			_						\dashv	\dashv	
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Hall Environmental Analysis Laboratory, Inc.

WO#: 1806F83

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID MB-38916

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 38916

RunNo: 52281

Prep Date: 6/27/2018

Result

Analysis Date: 6/27/2018 PQL

SeqNo: 1714260

Units: mg/Kg

HighLimit

%RPD **RPDLimit**

Qual

Analyte Chloride

ND 1.5

TestCode: EPA Method 300.0: Anions

Sample ID LCS-38916

SampType: LCS

RunNo: 52281

Client ID: LCSS Batch ID: 38916

Units: mg/Kg

Prep Date: 6/27/2018 Analysis Date: 6/27/2018

SeqNo: 1714261

Analyte

15.00

110

RPDLimit

Qual

Chloride

14

1.5

PQL

96.0

0

SPK value SPK Ref Val %REC LowLimit

SPK value SPK Ref Val %REC

LowLimit

HighLimit

%RPD

Qualifiers: Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix H Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit ND

PQL Practical Quanitative Limit % Recovery outside of range due to dilution or matrix

E Value above quantitation range

P Sample pH Not In Range

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

В Analyte detected in the associated Method Blank

Analyte detected below quantitation limits Page 2 of 5

Hall Environmental Analysis Laboratory, Inc.

WO#:

1806F83

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID LCS-38909	SampTyp	e: LC	S	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Batch II	D: 38 9	909	R	tunNo: 5	2269						
Prep Date: 6/27/2018	Analysis Dat	e: 6/	27/2018	S	SeqNo: 1	713078	Units: mg/K	(g				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Diesel Range Organics (DRO)	47	10	50.00	0	93.6	70	130					
Surr: DNOP	4.4		5.000		88.4	70	130					

Sample ID MB-38909	SampT	ype: ME	BLK	Tes	tCode: El	PA Method	8015M/D: Die	esel Rang	e Organics	
Client ID: PBS	Batch	ID: 38	909	R	RunNo: 5	2269				
Prep Date: 6/27/2018	Analysis D	ate: 6/	27/2018	S	SeqNo: 1	713079	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	9.2		10.00		92.4	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

Page 3 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1806F83

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID RB SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range Client ID: Batch ID: G52273 RunNo: 52273 Prep Date: Analysis Date: 6/27/2018 SeqNo: 1713631 Units: mg/Kg Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Gasoline Range Organics (GRO) ND 5.0 830 83.5 15 316 Surr: BFB 1000

TestCode: EPA Method 8015D: Gasoline Range Sample ID 2.5UG GRO LCS SampType: LCS Client ID: LCSS Batch ID: G52273 RunNo: 52273 Prep Date: Analysis Date: 6/27/2018 SeqNo: 1713632 Units: mg/Kg Analyte Result SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Gasoline Range Organics (GRO) 27 5.0 25.00 106 75.9 131 Surr: BFB 990 1000 98.6 15 316

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 4 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1806F83

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID RB	SampT	Гуре: МЕ	BLK	Tes	tCode: El	PA Method	8021B: Volat	tiles		
Client ID: PBS	Batch	h ID: B5	2273	R	RunNo: 5	2273				
Prep Date:	Analysis D	Date: 6/	27/2018	S	SeqNo: 1	713652	Units: mg/K	(g		
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	1.0		1.000		99.9	80	120			

Sample ID 100NG BTEX LO	Samp1	Гуре: LC	S	Tes	tCode: El	PA Method	8021B: Volat	tiles		
Client ID: LCSS	Batcl	h ID: B5	2273	F	RunNo: 5	2273				
Prep Date:	Analysis [Date: 6/	27/2018	8	SeqNo: 1	713653	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.95	0.025	1.000	0	94.6	77.3	128			
Toluene	0.97	0.050	1.000	0	97.1	79.2	125			
Ethylbenzene	0.97	0.050	1.000	0	96.8	80.7	127			
Xylenes, Total	2.9	0.10	3.000	0	98.2	81.6	129			
Surr: 4-Bromofluorobenzene	1.0		1.000		103	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

Page 5 of 5

P Sample pH Not In Range

RL Reporting Detection Limit



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name:	BLAGG		Work	Order Numb	per: 1806	F83			RcptN	lo: 1
Received By:	Anne Thor	ne	6/27/201	18 7:55:00 A	AM		ane ,	1.		
Completed By:	Anne Thor	710	6/27/201	18 8:10:41 A	M		anne	10		
Reviewed By:			6/27		7141		ane,	Ham		
sapeled by	is to	06/27/18								
Chain of Cus	,									
1. Is Chain of C		ete?			Yes	V	No [Not Present	
2. How was the	sample delive	ered?			Cour	er				
Log In										
3. Was an attern	npt made to co	ool the samples?			Yes	✓	No [NA 🗌	
4. Were all same	ples received	at a temperature	of >0° C to	o 6.0°C	Yes	✓	No [NA 🗀	
5. Sample(s) in	proper contair	ner(s)?			Yes	✓	No [
6. Sufficient sam	nple volume fo	r indicated test(s)?		Yes	~	No 🗆			
7. Are samples (except VOA a	nd ONG) proper	ly preserve	d?	Yes	V	No [
8. Was preserva	tive added to	bottles?			Yes		No 🗹		NA 🗆	
9. VOA vials hav	e zero headsp	pace?			Yes		No [No VOA Vials ✓	
10. Were any san	mple container	s received broke	n?		Yes		No 🔻			
									# of preserved bottles checked	
11. Does paperwo					Yes	✓	No L		for pH:	or >12 unless noted)
(Note discrepa 12. Are matrices of			Custody2		Yes	V	No 🗆	٦	Adjusted?	or > 12 dilless floted)
13. Is it clear what			Custody?			V	No [-		
14. Were all holding					Yes		No [Checked by:	
(If no, notify cu					103	•	110	<u> </u>	-	
Special Handi	ing (if appl	licable)								
15. Was client no	tified of all dis	crepancies with	this order?		Yes		No [NA 🗹	
Person	Notified:			Date		CANADA PARAMANA		LABRATISTY		
By Who	om:		ORNAL SELECT SEA STOP	Via:	eMa	il 🗌 P	hone F	ax	In Person	
Regardi	ing:		White Hardenburgers Comme					-		
Client In	nstructions:			************	ONE WASHINGTON TO SERVICE OF THE SER	Minteriore constraints and all	Marie Sante de Compositorio de			
16. Additional rer	marks:		-							
17. Cooler Infor	mation									
Cooler No	Temp °C	Condition Se	eal Intact	Seal No	Seal Da	te 🔠	Signed By			
1	1.4	Good Yes	3							

Hall Environmental Analysis Laboratory, Inc.

WO#: 1806F85

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID MB-38916

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

Batch ID: 38916

RunNo: 52281

Units: mg/Kg

Prep Date: 6/27/2018 Result

Analysis Date: 6/27/2018

SeqNo: 1714260

HighLimit

%RPD **RPDLimit** Qual

Analyte Chloride

PQL ND 1.5

SampType: LCS

SPK value SPK Ref Val %REC LowLimit

TestCode: EPA Method 300.0: Anions

Client ID:

LCSS

Batch ID: 38916

RunNo: 52281

Units: mg/Kg

Prep Date: 6/27/2018

Sample ID LCS-38916

Analysis Date: 6/27/2018

SeqNo: 1714261 %REC

HighLimit

%RPD

RPDLimit

Qual

Analyte Chloride

SPK value SPK Ref Val

90

LowLimit

110

PQL 96.0 14 1.5 15.00 0

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix

Analyte detected in the associated Method Blank В

Value above quantitation range

Analyte detected below quantitation limits

Page 2 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#: **1806F85**

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID LCS-38909	SampT	ype: LC	S	Tes	tCode: El	PA Method	8015M/D: Di	esel Rang	e Organics	
Client ID: LCSS	Batch	1D: 38	909	F	RunNo: 5	2269				
Prep Date: 6/27/2018 Analysis Date: 6/27/2018 SeqNo: 1713078 Units: mg/Kg										
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	10	50.00	0	93.6	70	130			
Surr: DNOP	4.4		5.000		88.4	70	130			

Sample ID MB-38909	SampT	ype: ME	BLK	Tes	tCode: El	PA Method	8015M/D: Die	esel Rang	e Organics	
Client ID: PBS	Batch	ID: 38	909	F	RunNo: 5	2269				
Prep Date: 6/27/2018	Analysis D	ate: 6/	27/2018	S	SeqNo: 1	713079	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	9.2		10.00		92.4	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

Page 3 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1806F85

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID RB	SampT	ype: ME	BLK	Test	Code: El	PA Method	8015D: Gaso	line Rang	е	
Client ID: PBS	Batch	ID: G5	2273	R	tunNo: 5	2273				
Prep Date:	Analysis D	ate: 6/	27/2018	S	eqNo: 1	713631	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	830		1000		83.5	15	316			

Sample ID 2.5UG GRO LCS	SampTy	pe: LC	S	Test	tCode: El	PA Method	8015D: Gaso	line Rang	е	
Client ID: LCSS	Batch	ID: G5	2273	R	RunNo: 5	2273				
Prep Date:	Analysis Da	ate: 6/	27/2018	S	SeqNo: 1	713632	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	27	5.0	25.00	0	106	75.9	131			
Surr: BFB	990		1000		98.6	15	316			

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 4 of 5

P Sample pH Not In Range

RL Reporting Detection Limit

Hall Environmental Analysis Laboratory, Inc.

WO#:

1806F85

29-Jun-18

Client:

Blagg Engineering

Project:

GCU 66

Sample ID RB	SampT	ype: ME	BLK	Tes	tCode: El	PA Method	8021B: Volat	iles		
Client ID: PBS	Batch	ID: B5	2273	F	RunNo: 5	2273				
Prep Date:	Analysis Date: 6/27/2018			S	SeqNo: 1	713652	Units: mg/K	g		
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	1.0		1.000		99.9	80	120			

Sample ID 100NG BTEX LC	Samp1	Type: LC	S	Tes	tCode: E	PA Method	8021B: Vola	tiles		
Client ID: LCSS	Analysis Date: 6/27/2018 Result PQL SPK value				RunNo: 5	2273				
Prep Date:	tit ID: LCSS Batch ID: Date: Analysis Date: yte Result PC ne 0.95 0.0 e 0.97 0.0				SeqNo: 1	713653	Units: mg/K	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.95	0.025	1.000	0	94.6	77.3	128			
Toluene	0.97	0.050	1.000	0	97.1	79.2	125			
Ethylbenzene	0.97	0.050	1.000	0	96.8	80.7	127			
Xylenes, Total	2.9	0.10	3.000	0	98.2	81.6	129			
Surr: 4-Bromofluorobenzene	1.0		1 000		103	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

Page 5 of 5

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



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: BLAGG Work Order Number:		nber: 1806F85	RcptNo: 1		
Received By: Anne Thorne	6/27/2018 7:55:00	AM	anne Am	· · ·	
Completed By: Anne Thome	6/27/2018 8:17:43	AM	Anne Sham		
Reviewed By: ENH 6/27/18			ame from	_	
1 akeled by h 06/27/13	4161118				*
Chain of Custody					
Is Chain of Custody complete?		Yes 🗸	No 🗌	Not Present	
2 How was the sample delivered?		Courier			
Log In		v	No 🗆	AVA 🗆	
3. Was an attempt made to cool the samples	<i>?</i>	Yes 🗸	NO L	NA L	
4. Were all samples received at a temperature	of >0°C to 6.0°C	Yes 🗸	No 🗌	NA 🗆	
		165		147	*
5. Sample(s) in proper container(s)?		Yes 🗸	No 🗌		
6. Sufficient sample volume for indicated test(e)2	Yes 🗸	No 🗆		
7. Are samples (except VOA and ONG) properly preserved?		Yes 🗸	No 🗆		
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 broken?		Yes	No 🗹	# of preserved	
11 Dags passaged match battle labels?		Yes 🗸	No 🗆	bottles checked for pH:	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)		Yes 🗹	140		>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 🗆		
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 with	this order?	Yes L	No 🗌	NA 🗹	1
Person Notified:	Date				*
By Whom:	Via:	eMail Ph	one 🗌 Fax	In Person	
Regarding: Client Instructions:					
(A)		* * * * * * * * * * * * * * * * * * *			J
16. Additional remarks:					
17. Cooler Information					
Cooler No Temp °C Condition S 1 1.4 Good Ye	eal Intact Seal No s	Seal Date	Signed By		



