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 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

Responsible Party: BPX Energy	OGRID: 778	Initial/Delineation Plan
Contact Name: Steve Moskal	Contact Telephone: (505) 330-9179	
Contact email: steven.moskal@bpx.com	Incident # *(assigned by OCD)*	
Contact mailing address: 1199 Main Ave. Suite 101, Durango CO, 81301	NCS1525853335	

Location of Release Source

Latitude: 36.981049° Longitude: -107.948261°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Brown Federal J 001	Site Type: Natural Gas Production Well
Date Release Discovered: April 19, 2010	API#: 30-045-29029

Unit Letter	Section	Township	Range	County
M	13	T32N	R11W	San Juan

NMOCD
MAR 13 20
DISTRICT III

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): unknown	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls):	Volume Recovered (bbls): 0
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☒ Condensate	Volume Released (bbls): unknown	Volume Recovered (bbls):
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release:

During a below grade tank (BGT) closure on April 19, 2010, soil impacts were identified. A five-point composite sample was collected from the open excavation with laboratory results for total petroleum hydrocarbons (TPH) were determined to be above the BGT closure standards. All other analyzed contaminants of concern were below lab closure standards. The results of the BGT closure required a subsequent investigation or remedial activity, however, no subsequent activities have been performed. BP proposes to investigate the soil impacts via vertical and lateral delineation using a hollow stem auger rig.

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State of New Mexico
Oil Conservation Division

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Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☒ The source of the release has been stopped.
☒ The impacted area has been secured to protect human health and the environment.
☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

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: Steve Moskal Title: Environmental Coordinator

Signature: [signature] Date: March 11, 2019

email: Steven.moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: Vanessa Fields Date: 3/14/2019

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Oil Conservation Division

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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?	~50 (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 vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

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

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.

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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: Steve Moskal Title: Environmental Coordinator

Signature: Date: March 11, 2019

email: steven.moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: Date:

State of New Mexico
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Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

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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.

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

☒ A scaled site and sampling diagram as described in 19.15.29.11 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

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

To:	Vanessa Fields (NMOCD)
From:	Steve Moskal (BP)
Date:	3/11/2019
Re:	Brown Federal J 001 – Delineation Plan API #30-045-29029 ULSTR: (M)- S13 - T32N - R11W; Lat. 36.981049°, Long -107.948261°

The Brown Federal J 001 site is an active natural gas production pad within the San Juan Basin Gas Field in San Juan County, New Mexico. The site on public land and located on a shared well pad with the BP operated Barnes B 021. Depth to groundwater is anticipated to be ~35' bgs (below ground surface). During a below grade tank (BGT) closure on April 19, 2010, soil impacts were identified. A five-point composite sample was collected from the open excavation with laboratory results for total petroleum hydrocarbons (TPH) were determined to be above the BGT closure standards. All other analyzed contaminants of concern were below lab closure standards. The results of the BGT closure required a subsequent investigation or remedial activity, however, no subsequent activities have been performed. BP proposes to investigate the soil impacts via vertical and lateral delineation using a hollow stem auger rig. BP does not anticipate any impacts to groundwater.

SOIL DELINEATION PLAN

BP proposes to advance 7 soil boring to a maximum of 35 feet bgs; one in the center of the former BGT location and 3 immediately of the anticipated downgradient, two side gradient and one up gradient of the excavation. The source boring will determine the depth of the impacts with an anticipated total depth of 35', while the up, down and side gradient locations will determine the lateral extents. The number, locations and depth of each boring will be adjusted as the drilling progress to better determine both the vertical and lateral extents of the soil impacts.

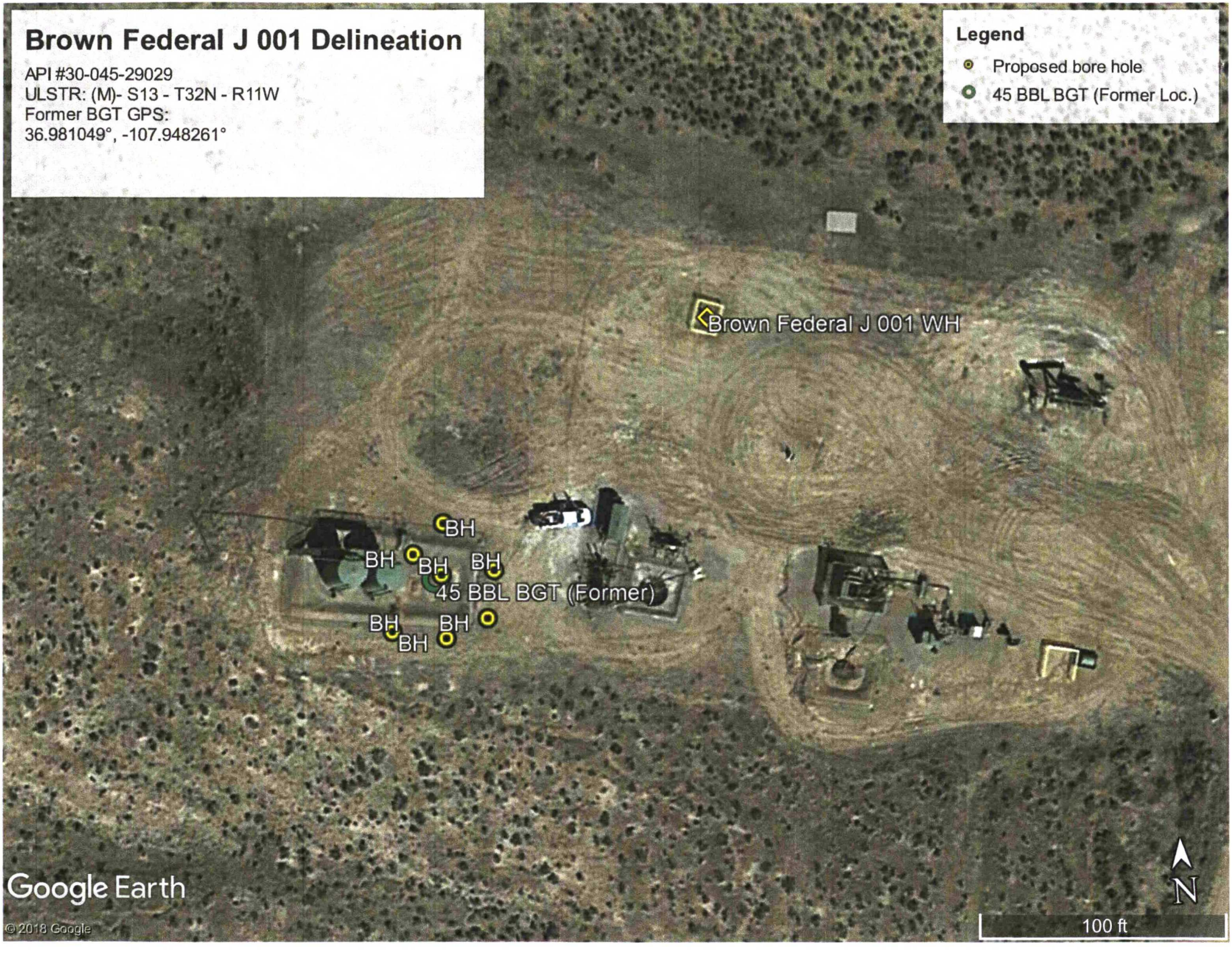
The borings will be advanced using a minimum 4" (ID) hollow stem auger or other recommended tooling adequate to accommodate 2" PVC soil vapor extraction (SVE) point installations, in the case that future SVE installation is desired. In each boring, 2-inch PVC well screen will be placed in the portion of identified soil impacts, likely from 20' bgs to 5' bgs. Each soil boring will be completed with a blank (solid pipe) riser to the surface for completion as an aboveground monument. The base of the PVC is preferred to have a cone bottom or slip cap. Sand pack will be added to the boring annulus to 1' above the screened interval. Hydrated bentonite or slurry will be placed in the remainder of the boring to ground surface.

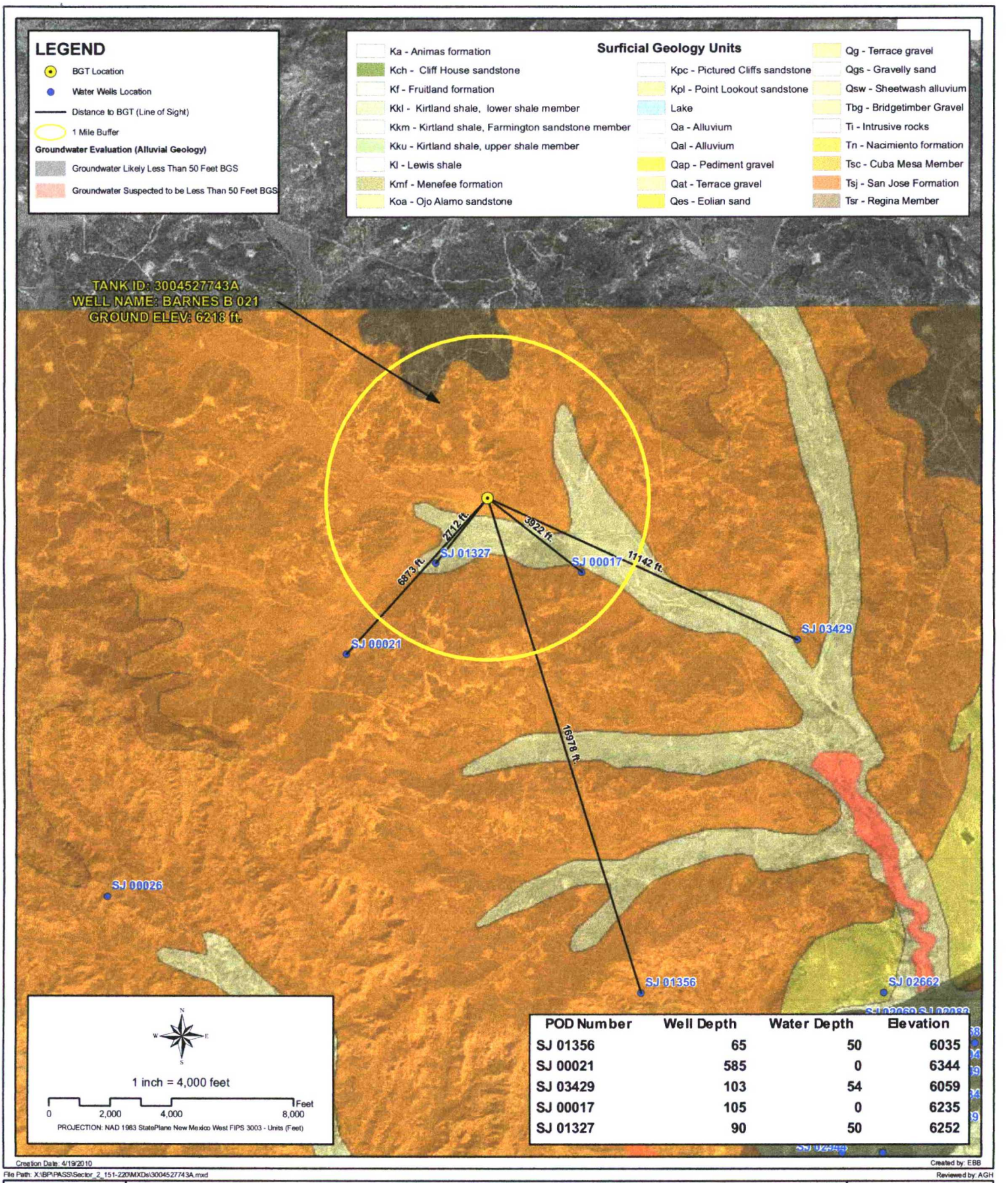
During advancement of the soil borings, soil samples will be collected for laboratory confirmation. A soil sample will be collected every 5' or more frequent if possible. Two soil samples will be collected from each boring, one at the field determined highest concentrated impact zone, and one from the total depth of the boring. The concentration of impacts will be based on field screening suing a calibrated photoionization detector, visual observation or other apparent field observations. All collected soil samples will be submitted for laboratory analysis, following handling and chain of custody protocols, for analysis via 8015 TPH, 8021 BTEX and 300.0 chloride.

Once lab results are obtained, BP will determine whether or not further delineation is required and will communicate with the NMOCD on a continued plan of action. Follow up reporting or delineation will be performed within 60 days of the lab analysis results.

Steve Moskal

Environmental Coordinator


Brown Federal J 001 Delineation
API #30-045-29029
ULSTR: (M)- S13 - T32N - R11W
Former BGT GPS:
36.981049°, -107.948261°
Legend
Proposed bore hole
45 BBL BGT (Former Loc.)
Brown Federal J 001 WH
BH
BH
BH
BH
45 BBL BGT (Former)
BH
BH
BH
Google Earth
© 2018 Google
N
100 ft



POD Number	Well Depth	Water Depth	Elevation
SJ 01356	65	50	6035
SJ 00021	585	0	6344
SJ 03429	103	54	6059
SJ 00017	105	0	6235
SJ 01327	90	50	6252

Creation Date: 4/19/2010
File Path: X:\BP\PASS\Sector_2_151-220\MXDs\3004527743A.mxd
Created by: EBB
Reviewed by: AGH

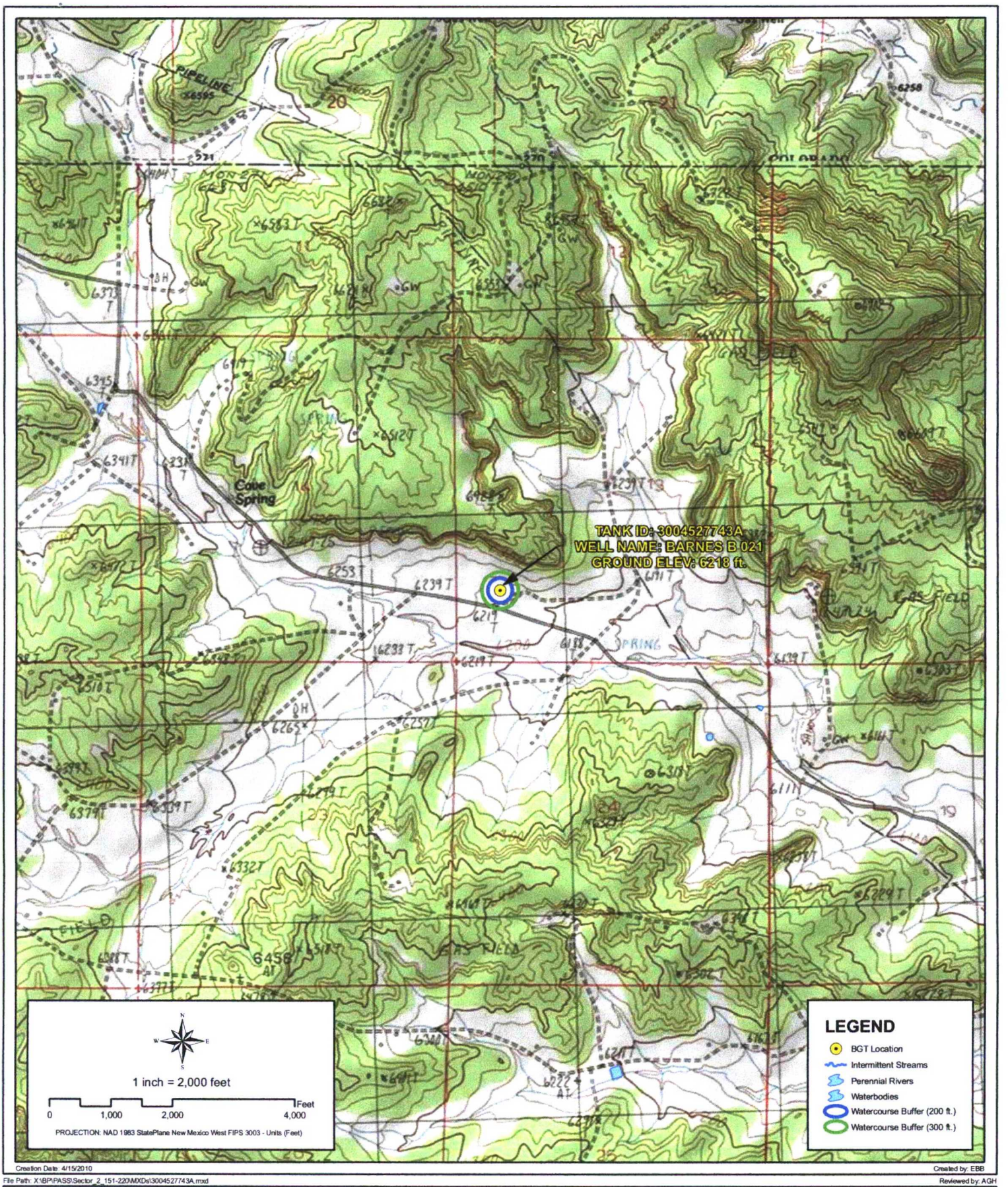
GROUNDWATER LESS THAN 50 FT.

WELL NAME: BARNES B 021

API NUMBER: 3004527743 TANK ID: 3004527743A

SECTION 13, TOWNSHIP 32.0N, RANGE 11W, P.M. NM23

FIGURE 1



Creation Date: 4/15/2010
Created by: EBB
File Path: X:\BP\PASS\Sector_2_151-220\MXDs\3004527743A.mxd
Reviewed by: AGH

bp

PROXIMITY TO WATERCOURSES

WELL NAME: BARNES B 021

API NUMBER: 3004527743 TANK ID: 3004527743A

SECTION 13, TOWNSHIP 32.0N, RANGE 11W, P.M. NM23

FIGURE 2