

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144
July 21, 2008

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

77A
Pit, Closed-Loop System, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: BP America Production Co. OGRID #: 778
Address: 1199 Main Ave., Suite 101, Durango, CO 81301
Facility or well name: GALLEGOS CANYON UNIT 581
API Number: 3004531026 OCD Permit Number: _____
U/L or Qtr/Qtr A Section 17.0 Township 29.0N Range 12W County: San Juan County
Center of Proposed Design: Latitude 36.73123 Longitude -108.11649 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____
** Reveg Must Be Completed 1st growing Season*
NMOCD
MAY 23 2019
DISTRICT III

3.
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** A
Volume: 95.0 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other DOUBLE WALLED DOUBLE BOTTOMED SIDEWALLS NOT VISIBLE
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

5.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

11.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.

Closed-loop Systems 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.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Previously Approved Design (attach copy of design) API Number: _____
☐ Previously Approved Operating and Maintenance Plan API Number: _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

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
☐ 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

14.

Proposed Closure: 19.15.17.13 NMAC**Instructions:** 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 ☐ Closed-loop System
☐ Alternative
 Proposed Closure Method: ☐ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

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 F 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 I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)**Instructions:** Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?☐ Yes (If yes, please provide the information below) ☐ No*Required for impacted areas which will not be used for future service and operations:*

- ☐ 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 I of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

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 source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which 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 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

Ground water is between 50 and 100 feet below the bottom of the buried waste

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

Ground water is more than 100 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

Within 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 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 private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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

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.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ 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

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

18.

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 F of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 19.15.17.11 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 Subsection F of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

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 belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

20.

OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☒ OCD Conditions (see attachment) *Front*

OCD Representative Signature: _____ Approval Date: 6/15/19

Title: Environmental Spec. OCD Permit Number: _____

21.

Closure Report (required within 60 days of closure completion): Subsection K of 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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 04/02/2019

22.

Closure Method:

☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

23.

Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

Required for impacted areas which will not be used for future service and operations:

- ☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.

Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Proof of Closure Notice (surface owner and division)
☐ Proof of Deed Notice (required for on-site closure)
☐ Plot Plan (for on-site closures and temporary pits)
☒ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☒ Disposal Facility Name and Permit Number
☒ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.73123 Longitude -108.11649 NAD: ☐ 1927 ☒ 1983

25.

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.

Name (Print): Steve Moskal Title: Field Environmental Coordinator

Signature: [Signature] Date: 5/21/2019

e-mail address: steven.moskal@bpx.com Telephone: 505-330-9179

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.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

BPX ENERGY
(formally BP America Production Company)
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit # 581 – Tank ID: A

API #: 3004531026

Unit Letter A, Section 17, T29N, R12W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BPX Energy (BPX) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BPX 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. BPX 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 BPX's NMOCD approved BGT design attached to the BPX Design and Construction Plan. BPX 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 BPX's NMOCD approved BGT Design attached to the BPX Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BPX 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. BPX 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. BPX 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 documented in the attached email.

3. BPX 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. BPX 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. BPX Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BPX Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BPX Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BPX Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BPX Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BPX Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BPX Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and/or sludge within the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BPX shall remove the BGT and dispose of it in a NMOC approved facility or recycle, reuse, or reclaim it in a manner that the NMOC 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. BPX 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. BPX shall test the soils beneath the BGT to determine whether a release has occurred. BPX 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 (mg/Kg)	Sample Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.019
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.076
TPH	US EPA Method SW-846 418.1	100	<47
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<60

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 beneath the BGT was sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are attached.

7. BPX 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 BPX will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

Sampling results reveal no evidence of a release has occurred.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BPX 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 within the active process area.

Sampling results reveal no evidence of a release has occurred. Area was backfilled with clean, earthen material and is within the active well pad.

10. BPX 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. BPX 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 BGT area has been backfilled with clean, earthen material and is within the active well pad. Reclamation will be completed within the allowable timeframe and will meet the site specific requirements of 19.15.17.13 NMAC.

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 BGT area has been backfilled with clean, earthen material and is within the active well pad. Reclamation will be completed within the allowable timeframe and will meet the site specific requirements of 19.15.17.13 NMAC.
12. BPX 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 BGT area has been backfilled with clean, earthen material and is within the active well pad. Reclamation will be completed within the allowable timeframe and will meet the site specific requirements of 19.15.17.13 NMAC.
13. BPX 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 BGT area has been backfilled with clean, earthen material and is within the active well pad. Reclamation will be completed within the allowable timeframe and will meet the site specific requirements of 19.15.17.13 NMAC.
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BPX shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
BPX will notify NMOCD when re-vegetation is successfully completed.
15. Within 60 days of closure completion, BPX 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 & contains a photo of the current reclamation requirements completed.**
16. BPX 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.

BP Pit Closure Notification – Gallegos Canyon Unit 581

From: Patti Campbell (Patti.Campbell@bpx.com)
To: Cory.Smith@state.nm.us; Vanessa.Fields@state.nm.us; aadeloye@blm.gov; l1thomas@blm.gov
Cc: jeffcblagg@aol.com; Steven.Moskal@BPX.COM; Tiffany.Griffith@BPX.COM; Sabre.Beebe@BPX.COM; blagg_njv@yahoo.com; c.elkins@kosinm.com;
Date: Monday, March 25, 2019 2:53 PM

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

March 25, 2019

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 581
API 30-045-31026
(A) Section 17 – T29N – R12W
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 March 28, 2019.

Should you have any questions, please feel free to contact BP.

Sincerely,

Patti Campbell
Regulatory Analyst
BP America Production Company
BPX Energy Inc.
(970) 712-5997
patti.campbell@bpx.com





BP America Production Company
1199 Main Ave., Suite 101
Durango, CO 81303
Phone: (970) 247 6800

March 25, 2019

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 581
API# - 3004531026

Dear Ms. Thomas,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about March 28, 2019. Barring any unforeseen issues, the work should be completed within 10 working days.

This site has been plugged and abandoned and BP is decommissioning the well site.

If witnessing of the tank removal is required, please contact Steve Moskal for a specific time (505)-330-9179.

Sincerely,

Patti Campbell

Patti Campbell
BPX – San Juan
Regulatory Analyst

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 (formerly BP America Production Co.)	OGRID 778
Contact Name Steve Moskal	Contact Telephone (505) 330-9179
Contact email Steven.Moskal@bpx.com	Incident # (assigned by OCD) cJK1625150013
Contact mailing address 1199 Main Ave., Suite 101, Durango, CO 81301	

Location of Release Source

Latitude 36.73123 Longitude -108.11649
(NAD 83 in decimal degrees to 5 decimal places)

Site Name GALLEGOS CANYON UNIT 581	Site Type Natural Gas Well
Date Release Discovered	API# (if applicable) 30-045-31026

Unit Letter	Section	Township	Range	County
A	17	29N	12W	San 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **TPH, BTEX, & chloride all below below-grade tank (BGT) permit closure standards.**

State of New Mexico
Oil Conservation Division

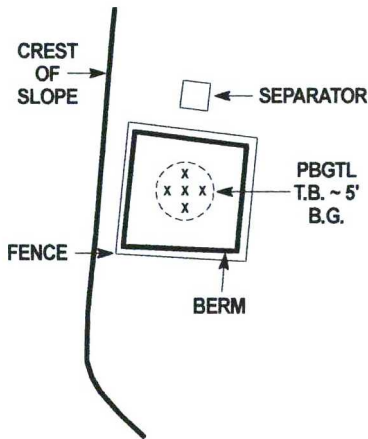
Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)? Not required.	

Initial Response

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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> 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: <u>Steve Moskal</u>	Title: <u>Environmental Coordinator</u>
Signature: _____	Date: _____
email: <u>Steven.Moskal@bpx.com</u>	Telephone: <u>(505) 330-9179</u>
<u>OCD Only</u> Received by: _____ Date: _____	

CLIENT: BPX	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004531026 TANK ID (if applicable): A																									
FIELD REPORT: (circle one) BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:		PAGE #: 1 of 1																									
SITE INFORMATION: SITE NAME: GCU # 581 QUAD/UNIT: A SEC: 17 TWP: 29N RNG: 12W PM: NM CNTY: SJ ST: NM 1/4 - 1/4 FOOTAGE: 1.45'N / 950'E NE/NE LEASE TYPE: FEDERAL / STATE / FEE / INDIAN LEASE #: SF078370 PROD. FORMATION: PC CONTRACTOR: KELLEY O.F.S. BPX - S. BEEBE		DATE STARTED: 03/28/19 DATE FINISHED: _____ ENVIRONMENTAL SPECIALIST(S): JCB																									
REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: 36.73115 X 108.11617 GL ELEV.: 5,767' 1) 95 BGT (DW/DB) GPS COORD.: 36.73123 X 108.11649 DISTANCE/BEARING FROM W.H.: 93.5', N74W 2) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____ 3) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____ 4) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____																											
SAMPLING DATA: CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">1) SAMPLE ID: 95 BGT 5-pt. @ 5'</td> <td style="width:15%;">SAMPLE DATE: 03/28/19</td> <td style="width:15%;">SAMPLE TIME: 1038</td> <td style="width:25%;">LAB ANALYSIS: 8015B/8021B/300.0 (CI)</td> <td style="width:10%;">OVM READING (ppm) 0.0</td> </tr> <tr> <td>2) SAMPLE ID: _____</td> <td>SAMPLE DATE: _____</td> <td>SAMPLE TIME: _____</td> <td>LAB ANALYSIS: _____</td> <td>_____</td> </tr> <tr> <td>3) SAMPLE ID: _____</td> <td>SAMPLE DATE: _____</td> <td>SAMPLE TIME: _____</td> <td>LAB ANALYSIS: _____</td> <td>_____</td> </tr> <tr> <td>4) SAMPLE ID: _____</td> <td>SAMPLE DATE: _____</td> <td>SAMPLE TIME: _____</td> <td>LAB ANALYSIS: _____</td> <td>_____</td> </tr> <tr> <td>5) SAMPLE ID: _____</td> <td>SAMPLE DATE: _____</td> <td>SAMPLE TIME: _____</td> <td>LAB ANALYSIS: _____</td> <td>_____</td> </tr> </table>			1) SAMPLE ID: 95 BGT 5-pt. @ 5'	SAMPLE DATE: 03/28/19	SAMPLE TIME: 1038	LAB ANALYSIS: 8015B/8021B/300.0 (CI)	OVM READING (ppm) 0.0	2) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____	3) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____	4) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____	5) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____
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4) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____																							
5) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	_____																							
SOIL DESCRIPTION: SOIL TYPE: SAND SILTY SAND SILT / SILTY CLAY / CLAY / GRAVEL / OTHER _____ SOIL COLOR: DARK YELLOWISH ORANGE COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY COHESIVE COHESIVE / HIGHLY COHESIVE CONSISTENCY (NON COHESIVE SOILS): LOOSE FIRM DENSE / VERY DENSE MOISTURE: DRY SLIGHTLY MOIST MOIST / WET / SATURATED / SUPER SATURATED SAMPLE TYPE: GRAB COMPOSITE # OF PTS. 5 DISCOLORATION/STAINING OBSERVED: YES NO EXPLANATION - _____ PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD HC ODOR DETECTED: YES NO EXPLANATION - _____ ANY AREAS DISPLAYING WETNESS: YES NO EXPLANATION - _____																											
SITE OBSERVATIONS: LOST INTEGRITY OF EQUIPMENT: YES NO EXPLANATION - _____ APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES NO EXPLANATION: _____ EQUIPMENT SET OVER RECLAIMED AREA: YES NO EXPLANATION - _____ OTHER: NMOC D OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. GAS WELL IS PLUGGED & ABANDONED (P&A).																											
EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): NA DEPTH TO GROUNDWATER: > 100' NEAREST WATER SOURCE: > 1,000' NEAREST SURFACE WATER: > 1,000' NMOC D TPH CLOSURE STD: 2,500 ppm																											
SITE SKETCH BGT Located: off on site PLOT PLAN circle: attached <div style="display: flex; align-items: center;">  <div style="margin-left: 20px;"> <p>N</p> <p>OVM CALIB. READ. = 100.2 ppm RF=1.00</p> <p>OVM CALIB. GAS = 100 ppm</p> <p>TIME: 10:45 (am)pm DATE: 03/28/19</p> </div> </div> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> MISCELL. NOTES PO #: 4301057524 AFE #: X7-00739-E:REST SIO #: 190040007672 GL #: 745277 Permit date(s): 06/14/10 OCD Appr. date(s): 03/08/18 <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">Tank ID</td> <td>OVM = Organic Vapor Meter ppm = parts per million</td> </tr> <tr> <td>A</td> <td>BGT Sidewalls Visible: Y / (N)</td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> </tr> </table> <p>Magnetic declination: 10° E</p> </div> <p style="text-align: center; margin-top: 10px;">X - S.P.D.</p>			Tank ID	OVM = Organic Vapor Meter ppm = parts per million	A	BGT Sidewalls Visible: Y / (N)		BGT Sidewalls Visible: Y / N		BGT Sidewalls Visible: Y / N																	
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NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM. NOTES: GOOGLE EARTH IMAGERY DATE: 10/5/2016. ONSITE: 03/28/19																											

Analytical Report

Lab Order 1903E16

Date Reported: 4/2/2019

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 95 BGT 5-pt @ 5'

Project: GCU 581

Collection Date: 3/28/2019 10:38:00 AM

Lab ID: 1903E16-001

Matrix: SOIL

Received Date: 3/29/2019 8:18:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	ND	60		mg/Kg	20	3/29/2019 11:08:15 AM	43964
EPA METHOD 8015D MOD: GASOLINE RANGE							Analyst: RAA
Gasoline Range Organics (GRO)	ND	3.8		mg/Kg	1	3/29/2019 12:15:59 PM	R58745
Surr: BFB	104	70-130		%Rec	1	3/29/2019 12:15:59 PM	R58745
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: JME
Diesel Range Organics (DRO)	ND	9.5		mg/Kg	1	3/29/2019 10:10:04 AM	43961
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	3/29/2019 10:10:04 AM	43961
Surr: DNOP	106	70-130		%Rec	1	3/29/2019 10:10:04 AM	43961
EPA METHOD 8260B: VOLATILES SHORT LIST							Analyst: RAA
Benzene	ND	0.019		mg/Kg	1	3/29/2019 12:15:59 PM	R58745
Toluene	ND	0.038		mg/Kg	1	3/29/2019 12:15:59 PM	R58745
Ethylbenzene	ND	0.038		mg/Kg	1	3/29/2019 12:15:59 PM	R58745
Xylenes, Total	ND	0.076		mg/Kg	1	3/29/2019 12:15:59 PM	R58745
Surr: 1,2-Dichloroethane-d4	86.8	70-130		%Rec	1	3/29/2019 12:15:59 PM	R58745
Surr: 4-Bromofluorobenzene	100	70-130		%Rec	1	3/29/2019 12:15:59 PM	R58745
Surr: Dibromofluoromethane	89.2	70-130		%Rec	1	3/29/2019 12:15:59 PM	R58745
Surr: Toluene-d8	91.3	70-130		%Rec	1	3/29/2019 12:15:59 PM	R58745

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

Qualifiers:	H	Holding times for preparation or analysis exceeded	ND	Not Detected at the Reporting Limit
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified at testcode

[illegible]

If necessary, samples submitted to Hail Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1903E16

02-Apr-19

Client: Blagg Engineering

Project: GCU 581

Sample ID: MB-43964		SampType: mblk		TestCode: EPA Method 300.0: Anions						
Client ID: PBS		Batch ID: 43964		RunNo: 58738						
Prep Date: 3/29/2019		Analysis Date: 3/29/2019		SeqNo: 1974891		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: LCS-43964		SampType: lcs		TestCode: EPA Method 300.0: Anions						
Client ID: LCSS		Batch ID: 43964		RunNo: 58738						
Prep Date: 3/29/2019		Analysis Date: 3/29/2019		SeqNo: 1974892		Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	97.0	90	110			

Qualifiers:

H Holding times for preparation or analysis exceeded
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

ND Not Detected at the Reporting Limit
RL Reporting Detection Limit
W Sample container temperature is out of limit as specified at testcode

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1903E16

02-Apr-19

Client: Blagg Engineering

Project: GCU 581

Sample ID: MB-43961	SampType: MBLK	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: PBS	Batch ID: 43961	RunNo: 58728								
Prep Date: 3/29/2019	Analysis Date: 3/29/2019	SeqNo: 1973388		Units: mg/Kg						
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	10		10.00		103	70	130			

Sample ID: LCS-43961	SampType: LCS	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Batch ID: 43961	RunNo: 58728								
Prep Date: 3/29/2019	Analysis Date: 3/29/2019	SeqNo: 1973389		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	93.3	63.9	124			
Surr: DNOP	4.6		5.000		92.0	70	130			

Qualifiers:

H Holding times for preparation or analysis exceeded
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

ND Not Detected at the Reporting Limit
RL Reporting Detection Limit
W Sample container temperature is out of limit as specified at testcode

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1903E16

02-Apr-19

Client: Blagg Engineering

Project: GCU 581

Sample ID: 100ng lcs	SampType: LCS		TestCode: EPA Method 8260B: Volatiles Short List							
Client ID: LCSS	Batch ID: R58745		RunNo: 58745							
Prep Date:	Analysis Date: 3/29/2019		SeqNo: 1973869		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.91	0.025	1.000	0	91.3	70	130			
Toluene	1.1	0.050	1.000	0	105	70	130			
Surr: 1,2-Dichloroethane-d4	0.41		0.5000		82.8	70	130			
Surr: 4-Bromofluorobenzene	0.52		0.5000		104	70	130			
Surr: Dibromofluoromethane	0.41		0.5000		82.5	70	130			
Surr: Toluene-d8	0.44		0.5000		88.8	70	130			

Sample ID: rb	SampType: MBLK		TestCode: EPA Method 8260B: Volatiles Short List							
Client ID: PBS	Batch ID: R58745		RunNo: 58745							
Prep Date:	Analysis Date: 3/29/2019		SeqNo: 1973863		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.40		0.5000		79.9	70	130			
Surr: 4-Bromofluorobenzene	0.53		0.5000		106	70	130			
Surr: Dibromofluoromethane	0.40		0.5000		80.1	70	130			
Surr: Toluene-d8	0.47		0.5000		93.1	70	130			

Qualifiers:

H Holding times for preparation or analysis exceeded
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

ND Not Detected at the Reporting Limit
RL Reporting Detection Limit
W Sample container temperature is out of limit as specified at testcode

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1903E16

02-Apr-19

Client: Blagg Engineering

Project: GCU 581

Sample ID: 2.5ug gro lcs	SampType: LCS	TestCode: EPA Method 8015D Mod: Gasoline Range								
Client ID: LCSS	Batch ID: R58745	RunNo: 58745								
Prep Date:	Analysis Date: 3/29/2019	SeqNo: 1973867 Units: mg/Kg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	91.5	70	130			
Surr: BFB	540		500.0		108	70	130			

Sample ID: rb	SampType: MBLK	TestCode: EPA Method 8015D Mod: Gasoline Range								
Client ID: PBS	Batch ID: R58745	RunNo: 58745								
Prep Date:	Analysis Date: 3/29/2019	SeqNo: 1973868 Units: mg/Kg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	530		500.0		107	70	130			

Qualifiers:

H Holding times for preparation or analysis exceeded
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

ND Not Detected at the Reporting Limit
RL Reporting Detection Limit
W Sample container temperature is out of limit as specified at testcode



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: **1803E16**

RcptNo: **1**

Received By: **Anne Thorne**

3/29/2019 8:18:00 AM

Anne Thorne

Completed By: **Anne Thorne**

3/29/2019 9:00:32 AM

Anne Thorne

Reviewed By:

At Labeled By:

3/29/19

Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐

2. How was the sample delivered? Courier

Log In

3. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐

4. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐

5. Sample(s) in proper container(s)? Yes ☒ No ☐

6. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐

7. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐

8. Was preservative added to bottles? Yes ☐ No ☒ NA ☐

9. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒

10. Were any sample containers received broken? Yes ☐ No ☒

11. Does paperwork match bottle labels? Yes ☒ No ☐

(Note discrepancies on chain of custody)

of preserved
bottles checked
for pH: _____
(<2 or >12 unless noted)

Adjusted? _____

Checked by: _____

12. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐

13. Is it clear what analyses were requested? Yes ☒ No ☐

14. Were all holding times able to be met? Yes ☒ No ☐

(If no, notify customer for authorization.)

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

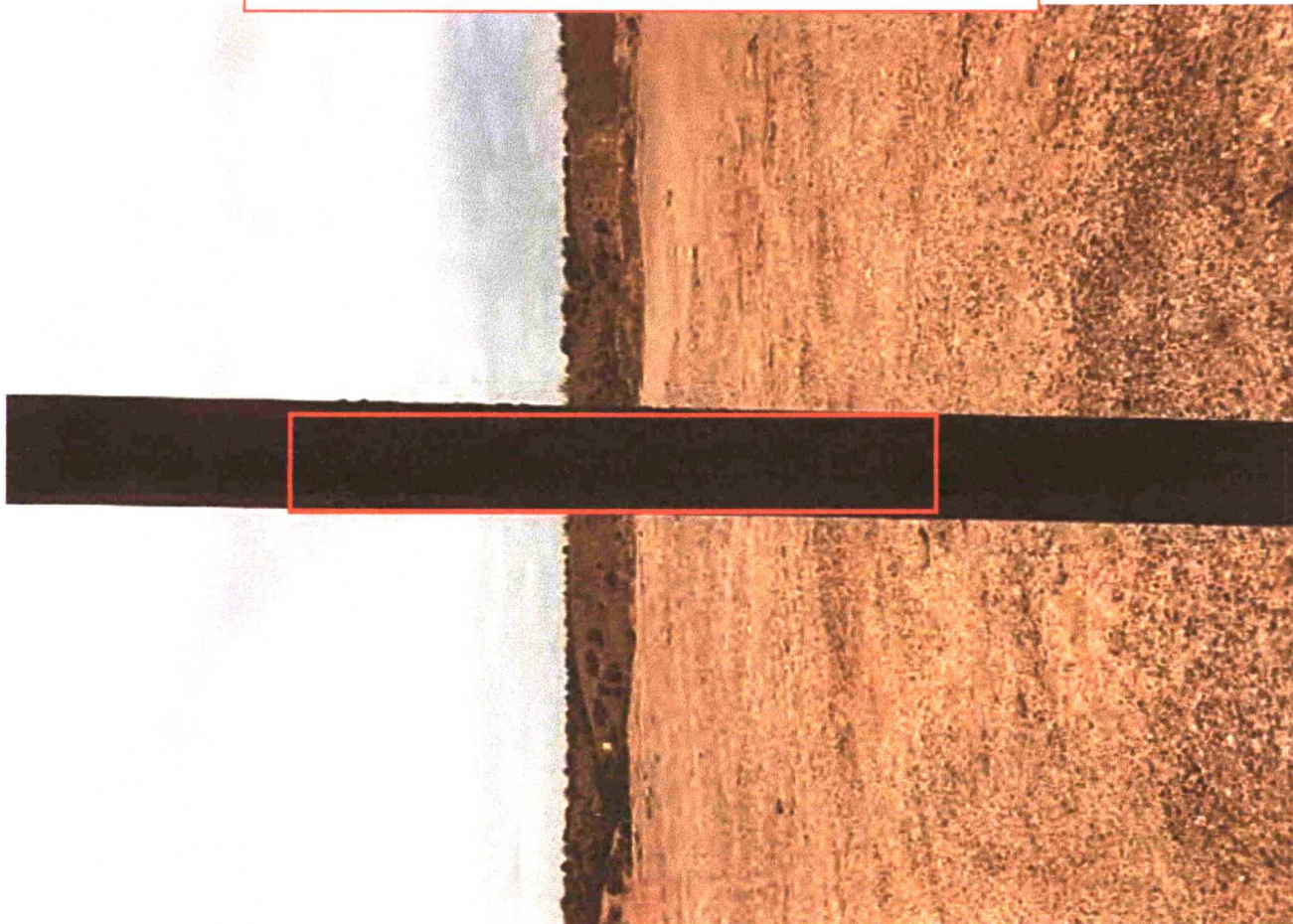
Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

16. Additional remarks:

17. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

GALLEGOS CANYON UNIT 581



Plugged & Abandoned
Marker

Previous 95 bbl BGT
Position (Tank ID: A)

