3R - 0381

ANNUAL MONITORING REPORT

04/25/2008

32381

April 25, 2008

Mr. Glenn von Gonten, Senior Hydrologist New Mexico Oil Conservation Division-NMOCD Environmental Bureau 1220 St. Francis Drive Santa Fe, New Mexico 87505

BLAGG ENGINEERING, INC. P.O. Box 87, Bloomfield, New Mexico 87413 Phone: (505)632-1199 Faz, (505)632-3903

Re: BP America Production Company Groundwater Monitoring Report GCU # 170, Unit K, Sec. 35, T29N, R12W, NMPM San Juan County, New Mexico

NMOCD Administrative/Environmental Order #: 3RP-381-0

Dear Mr. von Gonten:

BP America Production Company (BP) has retained Blagg Engineering, Inc. (BEI) to conduct environmental monitoring of groundwater at the GCU # 170.

The last formal correspondence to NMOCD was conducted with a letter dated February 15, 2006. Since then, BP has followed its NMOCD approved groundwater management plan and continues to monitor the site. No permanent closure is requested at this time.

If you have any questions concerning the enclosed documentation, please contact either myself or Jeffrey C. Blagg at (505) 632-1199. Thank you for your cooperation and assistance.

Respectfully submitted: *Blagg Engineering, Inc.*

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Nelson J. Velez Staff Geologist

Attachment: Groundwater Report (2 copies)

cc: Mr. Brandon Powell, Environmental Specialist, NMOCD District III Office, Aztec, NM Mr. Larry Schlotterback, Environmental Coordinator, BP, Farmington, NM (without lab report) Ms. Shannon Hoover, Senior Geologist, URS Corp., Austin, Texas



BP AMERICA PRODUCTION CO.

GROUNDWATER REMEDIATION REPORT

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GCU #170 (K) SECTION 35, T29N, R12W, NMPM SAN JUAN COUNTY, NEW MEXICO

PREPARED FOR: NEW MEXICO OIL CONSERVATION DIVISION 1220 ST. FRANCIS DRIVE SANTA FE, NEW MEXICO 87504

APRIL 2008

PREPARED BY: BLAGG ENGINEERING, INC.

Consulting Petroleum / Reclamation Services P.O. Box 87 Bloomfield, New Mexico 87413

BP AMERICA PRODUCTION COMPANY GCU # 170 - Separator Pit NE/4 SW/4, Sec. 35, T29N, R12W

Monitor Well Sampling Dates: 6/29/06, 6/25/07

Site Historic Summary:

A site separator pit closure was initiated in March 1995 by removing impacted soil via excavation. Documentation for this work and subsequent groundwater monitoring data for the site have previously been submitted for New Mexico Oil Conservation Division (NMOCD) review. The reporting herein is for site monitoring for 2006 and 2007. Site features are depicted on Figure 1.

Groundwater Monitor Well Sampling Procedures:

Prior to sample collections, MW #3R was purged approximately three (3) well bore volumes with new disposable bailers. The groundwater samples were collected following US EPA: SW-846 protocol, were placed into laboratory supplied containers with appropriate preservative, and stored in an ice chest for express delivery to an analytical laboratory for testing under strict chain-of-custody procedures. Analytical testing included benzene, toluene, ethylbenzene, and total xylenes (**BTEX**) by US EPA Method 8021B.

Fluids generated during monitor well development and purging were managed by discarding into the separator tank pit located on the well site. The tank pit contents are then disposed through approved NMOCD operational procedures for removal of produced fluids.

Groundwater Quality & Flow Direction Information:

Annual sampling of groundwater monitor well MW #3R was conducted in June 2006 and June 2007. A historical summary of laboratory analytical results is included within the tables on the following pages and field/laboratory reports are included.

Groundwater elevations have consistently been measured with a gradient towards the northwest direction (Figures 2 and 3).

Summary and/or Recommendations:

Continued site monitoring per BP's NMOCD approved Ground Water Management Plan is recommended. Hydrocarbon impacts appear to be in a steady state condition with benzene as the only analyte with concentrations above the New Mexico Water Quality Control Commission (NMWQCC) groundwater standards. No additional remedial actions are indicated or suggested at this time. Further delineation of down-gradient impacts is indicated with one (1) or more additional monitor wells proposed to address this issue.

BP AMERICA GROUNDWATER MONITOR WELL LABORATORY RESULTS SUBMITTED BY BLAGG ENGINEERING, INC.

GCU #170 - SEPARATOR PIT UNIT K, SEC. 35, T29N, R12W

REVISED DATE: August 3, 2007

FILENAME: (17-2Q-07.WK4) NJV

								BTE	X EPA METI	HOD 8021B	(ppb)
SAMPLE	MONITOR	D.T.W.	T.D.	TDS	COND.	pН	PRODUCT	Benzene	Toluene	Ethyl	Total
DATE	WELL #	(ft)	(ft)	mg/L	(umhos/cm)		(ft)			Benzene	Xylene
			,		· · · · · ·						
28-Jun-95	MW #1	10.50	15.00		1,400	7.4		0.2	0.2	0.3	0.9
08-Sep-95		9.56			1,400	7.8		206	82.3	4.9	67.0
07-Dec-95		9.91			1,700	6.8		ND	0.37	ND	ND
08-Mar-96		10.93			1,200	6.6		ND	0.97	ND	ND
04-Jun-96		10.74			1,300	6.7		ND	ND	ND	ND
28-Jun-95	WP #2	10.45	15.00		1,600	7.4		1.9	38.3	0.2	0.8
08-Sep-95		9.35			1,300	7.4		47.1	19.8	1.2	17.6
07-Dec-95		9.45			1,600	7.2		ND	ND	ND	ND
08-Mar-96		10.24			1,700	7.0		ND	ND	ND	ND
04-Jun-96		10.00			2,100	6.9		ND	ND	ND	ND
28-Jun-95	MW #3	10.45	15.00		1,500	7.4		2115.7	4485.8	318	2704.4
08-Sep-95		9.60			1,700	7.8		1,200	815	131	661
07-Dec-95		9.80			1,800	7.0		4,830	7,680	294	2,760
08-Mar-96		10.74			1,500	6.6		5,020	6,410	105	2,603
04-Jun-96		10.57			1,600	6.6		5,140	5,560	116	2,631
24-Jun-97		10.72			1,700	6.9		1,115	542	88.2	850
08-Jun-98		10.69			1,600	7.3		921	1,020	16.1	279.4
28-May-99		10.29		1	1,700	7.0		69.3	78.1	3	88.7
24-May-00		10.70			1,700	7.1		1,100	770	19	410
26-Jun-01	MW #3R	10.45	19.50		2,200	7.21		160	540	76	590
31-May-02		10.45			2,600	7.18		32	17	2.3	29.6
29-May-03		10.34			1,800	6.95		75	30	4.8	38
24-Jun-04		10.30			2,300	6.92		71	26	6.4	36
27-Jun-05		10.15			2,000	7.00		80	47	6.6	53
29-Jun-06		9.91			1,900	6.92		130	39	8.3	150
25-Jun-07		9.71			2,000	6.76		270	170	27	310
26-Jun-01	MW #4	11.14	18.50		800	7.41		ND	ND	ND	ND
		NMM	QCC G	ROUNI	OWATER S	STAND	ARDS	10	750	750	620

NOTES: 1) RESULTS IN BOLD RED TYPE INDICATE EXCEEDING NMWQCC STANDARDS.

2) RESULTS IN BOLD BLUE TYPE INDICATE BELOW NMWQCC STANDARDS AFTER PREVIOUS RESULTS IN BOLD RED TYPE EXCEEDED.

3) ND INDICATES NOT DETECTED AT THE REPORTING LIMITS (less than regulatory standards of at least a magnitude of 10).







BLAGG ENGINEERING. INC.

MONITOR WELL DEVELOPMENT & / OR SAMPLING DATA

CLIENT: BP AMERICA PROD. CO. CHAIN-OF-CUSTODY # : N/A GCU #170 - SEPARATOR PIT LABORATORY (S) USED : HALL ENVIRONMENTAL UNIT K, SEC. 35, T29N, R12W NJV Date : June 29, 2006 SAMPLER : NJV Filename : 06-29-06.WK4 PROJECT MANAGER : TOTAL WELL WELL WATER DEPTH TO SAMPLING pН CONDUCT TEMP. VOLUME # WATER DEPTH TIME (umhos) PURGED ELEV. ELEV. (celcius) (ft) (ft) (ft) (ft) (gal.) WP-2 100.80 91.38 9.42 15.00 -_ ---MW-3R 9.91 1255 6.92 99.59 89.68 19.50 1,900 24.5 4.75 **MW-4** 18.50 101.14 90.47 10.67 -----7.00 2,800 **INSTRUMENT CALIBRATIONS =** 06/26/06 0630 DATE & TIME =

NOTES : Volume of water purged from well prior to sampling; V = pi X r2 X h X 7.48 gal./ft3) X 3 (wellbores). (i.e. 2" MW r = (1/12) ft. h = 1 ft.) (i.e. 4" MW r = (2/12) ft. h = 1 ft.)

Ideally a minimum of three (3) wellbore volumes:

2.00 " well diameter = 0.49 gallons per foot of water.

Comments or note well diameter if not standard 2".

Poor/fair recovery in MW #3R. Collected BTEX sample from MW #3R only.

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CLIENT	Blagg Engineering			Client Sampl	e ID: MW #	43R
Lab Order:	0606375			Date: 6/29/2	2006 12:55:00 PM	
Project:	GCU #170			Date Rece	ived: 6/30/2	2006
Lab ID:	0606375-01	,		EOUS		
Analyses		Result	PQL Qu	al Units	DF	Date Analyzed
EPA METHOD	8021B: VOLATILES					Analyst: NSB
Benzene		130	5.0	μg/L	5	7/11/2006 1:20:17 PM
Toluene		39	1.0	µg/L	1	7/10/2006 5:10:06 PM
Ethylbenzene		8.3	1.0	µ́g/L	1	7/10/2006 5:10:06 PM
Xylenes, Total		150	15	µg/L	5	7/11/2006 1:20:17 PM
Surr: 4-Brom	nofluorobenzene	112	72.2-125	%REC	1	7/10/2006 5:10:06 PM

Hall Environmental Analysis Laboratory, Inc.

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Date: 12-Jul-06

Qualifiers:

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Value exceeds Maximum Contaminant Level Ε Value above quantitation range

Analyte detected below quantitation limits J

S Spike Recovery outside accepted recovery limits

- В Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Page 1 of 1

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QA/QC SUMMARY REPORT

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 Blagg Engineering

GCU #170						· · · · · · · · · · · · · · · · · · ·		Work ()rder:	0606375
Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPD	Limit	Qual
gethod: SW8021						-				
ample ID: 5ML RB		MBLK			Batch ID	D: R19846	Analysis E	Date:	7/10/2	006 8:44:37 AM
Benzene	ND	µg/L	1.0							
oluene	ND	µg/L	1.0							
thylbenzene	ND	µg/L	1.0							
ylenes, Total	ND	µg/L	3.0							
Sample ID: 5ML RB		MBLK			Batch II	D: R19868	Analysis E	Date:	7/11/2	006 8:11:30 AM
enzene	ND	μg/L	1.0							
oluene	ND	µg/L	1.0							
Ethylbenzene	ND	µg/L	1.0							
ylenes, Total	ND	μg/L	3.0							
ample ID: 100NG BTEX LCS		LCS			Batch II): R19846	Analysis E	Date:	7/10/2	006 1:14:32 PM
Benzene	19.16	μg/L	1.0	95.8	85	115				
Joluene	18.37	μg/L	1.0	90.3	85	118				
thylbenzene	19.10	μg/L	1.0	95.5	85	116				
Xylenes, Total	59.24	∙µg/L	3.0	96.2	85	119				
Sample ID: 100NG BTEX LCS		LCS			Batch I	D: R19868	Analysis D	Date:	7/11/2	006 7:20:12 PM
enzene	18.97	µg/L	1.0	94.8	85	115				
Toluene	17.83	µg/L	1.0	89.1	85	118				
Ethylbenzene	18.23	µg/Ľ	1.0	91.1	85	116				
ylenes, Total	56.77	µg/L	3.0	93.1	85	119				
ample ID: 100NG BTEX LCSD		LCSD			Batch I	D: R19846	Analysis D	Date:	7/10/2	006 6:40:10 PM
Benzene	19.17	µg/L	1.0	95. 9	85	115	0.0730	27		
oluene	17.96	µg/L	1.0	88.2	85	118	2.27	19		
thylbenzene	18.63	µg/L	1.0	93.2	85	116	2.46	10		
- Xylenes, Total	59.62	μg/L	3.0	96.8	85	119	0.643	13		
ample ID: 100NG BTEX LCSD		LCSD			Batch I	D: R19868	Analysis E	Date:	7/11/2	006 7:49:12 PM
enzene	19.72	µg/L	1.0	98.6	85	115	3.88	27		
Toluene	19.09	µg/L	1.0	95.4	85	118	6.84	19		
athylbenzene	19.91	µg/L	1.0	99.6	85	116	8.83	10		
lylenes, Total	61.88	µg/L	3.0	102	85	119	8.61	13		

Qualifiers:

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Value above quantitation range

Analyte detected below quantitation limits

RPD outside accepted recovery limits

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H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Spike Recovery outside accepted recovery limits

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Page 1

Hall Enviro	nmental Anal	ysis Laborato	ory, Inc.							
		\wedge	Sample	Rece	eipt Ch	ecklist				
Client Name Bl	AGG					Date and Tim	e Received:		6/	30/2006
Work Order Nun	nber 0606375)			Received by	у АТ			
Checklist compl	eted by Signature	the I	h		Date	_le130	5/06			
Matrix		(Carrier name	<u>Grey</u>	hound					
Shipping contair	ner/cooler in good co	ndition?		Yes		No 🗔	Not Present			
Custody seals ir	tact on shipping cor	tainer/cooler?		Yes		No 🗌	Not Present		Not Shipped	
Custody seals ir	itact on sample bottl	es?		Yes		No 🗹	N/A			
Chain of custod	y present?			Yes		No 🗌				
Chain of custod	y signed when relinq	uished and receive	d?	Yes		No				
Chain of custod	y agrees with sample	e labels?		Yes		No 🗌				
Samples in prop	er container/bottle?			Yes		No 🗌				
Sample contain	ers intact?			Yes		No 🗌				
Sufficient sampl	e volume for indicate	ed test?		Yes		No 🗌				
All samples reco	eived within holding t	ime?		Yes		No 🗌				
Water - VOA via	ils have zero headsp	ace? No V	/OA vials subr	nitted		Yes 🗹	No 🗌			
Water - pH acce	ptable upon receipt	?		Yes		No 🗌	N/A 🔽	ļ		
Container/Temp	Blank temperature?				6°	4° C ± 2 Accept If given sufficier	table nt time to cool.			
COMMENTS:										
=====										·
Client contacted	i	Date c	contacted:			Pei	rson contacted			
Contacted by:		Regar	ding							
Comments:						·				
								·		
	tion						<u> </u>			
Corrective Ac										

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BLAGG ENGINEERING, INC.

MONITOR WELL DEVELOPMENT & / OR SAMPLING DATA

CLIENT: BP AMERICA PROD. CO.

CHAIN-OF-CUSTODY # : N / A

LABORATORY (S) USED : HALL ENVIRONMENTAL

GCU #170 - SEPARATOR PIT UNIT K, SEC. 35, T29N, R12W

Date : June 25, 2007

Filename : 06-25-07.WK4

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SAMPLER :N J VPROJECT MANAGER :N J V

WELL #	WELL FLEV	WATER ELEV.	DEPTH TO WATER	TOTAL DEPTH	SAMPLING TIME	рН	CONDUCT (umhos)	TEMP. (celcius)	VOLUME PURGED
	(ft)	(ft)	(ft)	(ft)					(gal.)
WP-2	100.80	91.83	8.97	15.00	-	_	-	-	-
MW-3R	99.59	89.88	9.71	19.50	0815	6.76	2,000	15.8	4.75
MW-4	101.14	90.72	10.42	18.50	-	.	-	-	-
			INSTRUM	ENT CALIE	RATIONS =	7.00	2,800		
				DATI	E & TIME =	06/25/07	0550		

NOTES: <u>Volume of water purged from well prior to sampling</u>; $V = pi X r_2 X h X 7.48 gal./ft3) X 3 (wellbores).$ (i.e. 2" MW r = (1/12) ft. h = 1 ft.) (i.e. 4" MW r = (2/12) ft. h = 1 ft.)

Ideally a minimum of three (3) wellbore volumes:

2.00 " well diameter = 0.49 gallons per foot of water.

Comments or note well diameter if not standard 2".

Excellent recovery in MW # 3R. Collected sample from MW # 3R for BTEX analysis only.

	J		, <u>, , , , , , , , , , , , , , , , , , </u>	-		
CLIENT:	Blagg Engineering		· · · · ·	Client Sample	ID: MW	//////////////////////////////////////
Lab Order:	0706378			ate: 6/25/2	2007 8:15:00 AM	
Project:	GCU #170			Date Receiv	ved: 6/26/2	2007
Lab ID:	0706378-01			Mat	rix: AQU	EOUS
Analyses		Result	PQL Ç	Qual Units	DF	Date Analyzed
EPA METHOD	8021B: VOLATILES		· ·		····	Analyst: NSB
Benzene		270	10	µg/L	10	7/1/2007 7:54:53 AM
Toluene		170	10	µg/L	10	7/1/2007 7:54:53 AM
Ethylbenzene		27	10	µg/L	10	7/1/2007 7:54:53 AM
Xylenes, Total		310	20	µg/L	10	7/1/2007 7:54:53 AM
Surr: 4-Brom	ofluorobenzene	88.2	70.2-105	%REC	10	7/1/2007 7:54:53 AM

Hall Environmental Analysis Laboratory. Inc.

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Date: 02-Jul-07

 Qualifiers:
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 Value exceeds Maximum Contaminant Level
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 Value above quantitation range
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 J
 Analyte detected below quantitation limits
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 ND
 Not Detected at the Reporting Limit
 RL
 H

 S
 Spike recovery outside accepted recovery limits
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B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

STODY RECORD Other: Date of a date of the second of the se	$\frac{1}{2} \left(\frac{1}{200} 1$	2X & 7 Project #:		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	- / / A Sampler: ルノ A A 11 A 00 88 11 1 A 12 A 11 A 10 88 4 11 A 10	Sample Temperature: Sample Te	Tit Bubbles Iti Sample I.D. No. Mumber/Volume Preservative HEAL No. HEAL No. HEAL No. HEAL No. HEAL No. BTEX + M BTEX + M Breschative HPG12 HN0.3 Annors (Crosservative Crosservative	7K MW # 3R 2 -40m/ / / / / / / /						Juisbed By: (Signature) Received By: (Signature) Remarks: Autor Action Action Juished By: (Signature) Action
CHAIN-OF-CUSTODY RECORD	Client CLAEC ENC. BP AMERICA	Address: P.O. BOX 87	BLED. NM 87413		Phone #: 632 - 1199	Fax #:	Date Matrix Sample I.D. No.	6/25/07 0815 WATER MW # 3R						Date: Time: Relinquished By: (Signature) 6/25/07/5/5/ Date: Time: Relinquished By: (Signature)

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QA/QC SUMMARY REPORT

Sec.	Client:BlaggProject:GCU	g Engineering #170						Work	Order: 0706378
1	Analyte	Result	Units	PQL	%Rec	LowLimit H	lighLimit	%RPD RP	DLimit Qual
	Method: SW8021 Sample ID: 5ML REAGEN		MBLK			Batch ID	R24198	Analysis Date:	6/30/2007 6:59:05 PM
	Benzene	ND	µg/L	1.0					
	Toluene	ND	µg/L	1.0					
	Ethylbenzene	ND	µg/L	1.0					
	Xylenes, Total	ND	µg/L	2.0					
	Sample ID: 100NG BTEX	LCS	LCS			Batch ID	R24198	Analysis Date:	6/30/2007 11:44:25 PM
í۵,	Benzene	19.42	µg/L	1.0	97.1	85.9	113		
4	Toluene	19.80	µg/L	1.0	99.0	86.4	113		
-	Ethylbenzene	20.03	µg/L	1.0	100	83.5	118		
	Xylenes, Total	59.67	µg/L	2.0	99.4	83.4	122		

Qualifiers:

E Value above quantitation range

J Analyte detected below quantitation limits

R RPD outside accepted recovery limits

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

Spike recovery outside accepted recovery limits

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Hall Environmental Analysis Laboratory, Inc.

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	Sample Receipt C	Checklist		
Client Name BLAGG		Date and Ti	me Received:	6/26/2007
Work Order Number 0706378		Received	by ARS	
Checklist completed by Signature	6/26/D7	e		
Matrix Ca	rrier name <u>UPS</u>			
Shipping container/cooler in good condition?	Yes 🗹	No	Not Present	
Custody seals intact on shipping container/cooler?	Yes 🗹	No 🗔	Not Present	Not Shipped
Custody seals intact on sample bottles?	Yes 🗌	No 🗌	N/A	
Chain of custody present?	Yes	No 🗹		
Chain of custody signed when relinquished and received?	Yes 🗌	No 🗹		
Chain of custody agrees with sample labels?	Yes	No 🗹		
Samples in proper container/bottle?	Yes 🗌	No 🔽		
Sample containers intact?	Yes	No 🔽		
Sufficient sample volume for indicated test?	Yes 🗌	No 🔽		
All samples received within holding time?	Yes 🗌	No 🔽		
Water - VOA vials have zero headspace? No VO	A vials submitted	Yes 🗹	No 🗌	٠
Water - Preservation labels on bottle and cap match?	Yes 🗌	No 🗌	N/A 🔽	
Water - pH acceptable upon receipt?	Yes	No 🗌	N/A 🗹	
Container/Temp Blank temperature?	8°	4° C ± 2 Acce	ptable	
COMMENTS:		If given suffici	ent time to cool.	
	···· ··· ··· ··· ··· ··· ···· ···· ····			
Client contacted Date cor	ntacted:	P	erson contacted	
Contacted by: Regardin	ng	· ·· · · · ·		
Comments:		••••••		
	·····			
		······		· · · ·
· ·				
Corrective Action		· · · · · · ·	· · · · ·	

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