

February 26, 2019

Attention: Environmental Specialists
New Mexico Oil Conservation Division
District III
1000 Rio Brazos Road
Aztec, NM 87410

Re: Gallegos Canyon Unit 229E Groundwater Monitoring Update
(E) Sec 21 – T28N – R12W, San Juan County, NM
API #30-045-23900
3RP – 421

In the attached document, BP provides an update to the subject site regarding groundwater monitoring conducted since the previous submittal documented on February 1, 2011. This report documents a single groundwater monitoring event of monitor well (MW) #4, conducted on February 16, 2011. MW#4 is located on the original production well pad. The production well was plugged and abandoned on March 31, 2003 and since reclaimed. The only BP equipment remaining on site is the groundwater monitoring wells and fencing used during reclamation.

BP has proposed to install two down gradient monitor wells to demonstrate closure of the site. These wells will be located off the BP lease. Identification of the tribal parcel owner has not been successful and therefore access has not been granted.

No activity has been conducted at the site since February of 2011. All other site activity is enclosed in the February 11, 2011 submittal.

If you have any questions or concerns, please contact me at (505) 330-9179 or at Steven.Moskal@bpx.com.

Sincerely,



Steve Moskal
Field Environmental Coordinator

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

February 26, 2019

Mr. Steven Moskal
BPX Energy
1199 Main Street, Ste. 101
Durango, Colorado 81301

Re: BPX Energy - GCU 229E - NMOCD: 3RP-421
Remediation Update
(E) Sec. 21 - T28N – R12W, San Juan County, NM

Dear Mr. Moskal:

At your request, Blagg Engineering, Inc. (BEI) has updated the available site information concerning environmental work at the BPX operated GCU 229E (PxA) (Figure 1). This update is to meet a request from the New Mexico Oil Conservation Division (NMOCD) to make their site records current. The most recent data report submitted to the NMOCD Environmental Bureau is the BEI document "Groundwater Monitoring Report, GCU 229E", transmitted on February 1, 2011. This document is found within the NMOCD Environmental File 3RP-421. The report details site groundwater monitoring data and recommends installation of an additional down-gradient monitoring well.

The only site activity conducted since February 1, 2011 has been a single sample event of monitor well MW-4 on February 16, 2011. Laboratory analytical test results (attached) on that event completed five (5) continuous quarters with the well testing below regulatory standards (summary table attached). Remediation at the site had previously been pursuant to BPX's "Groundwater Management Plan", as approved by NMOCD. All site monitor wells have achieved closure and no additional sampling has been required.

BEI is aware that BPX has continued to pursue off-site access for installation of the recommended monitor well. Surface ownership has not been determined but appears to be an un-identified Navajo entity. BPX has reached out to both NAPI and BIA, but neither has accepted accountability or be willing to provide access. BEI does not recommend additional site activity until access for that drilling is granted.

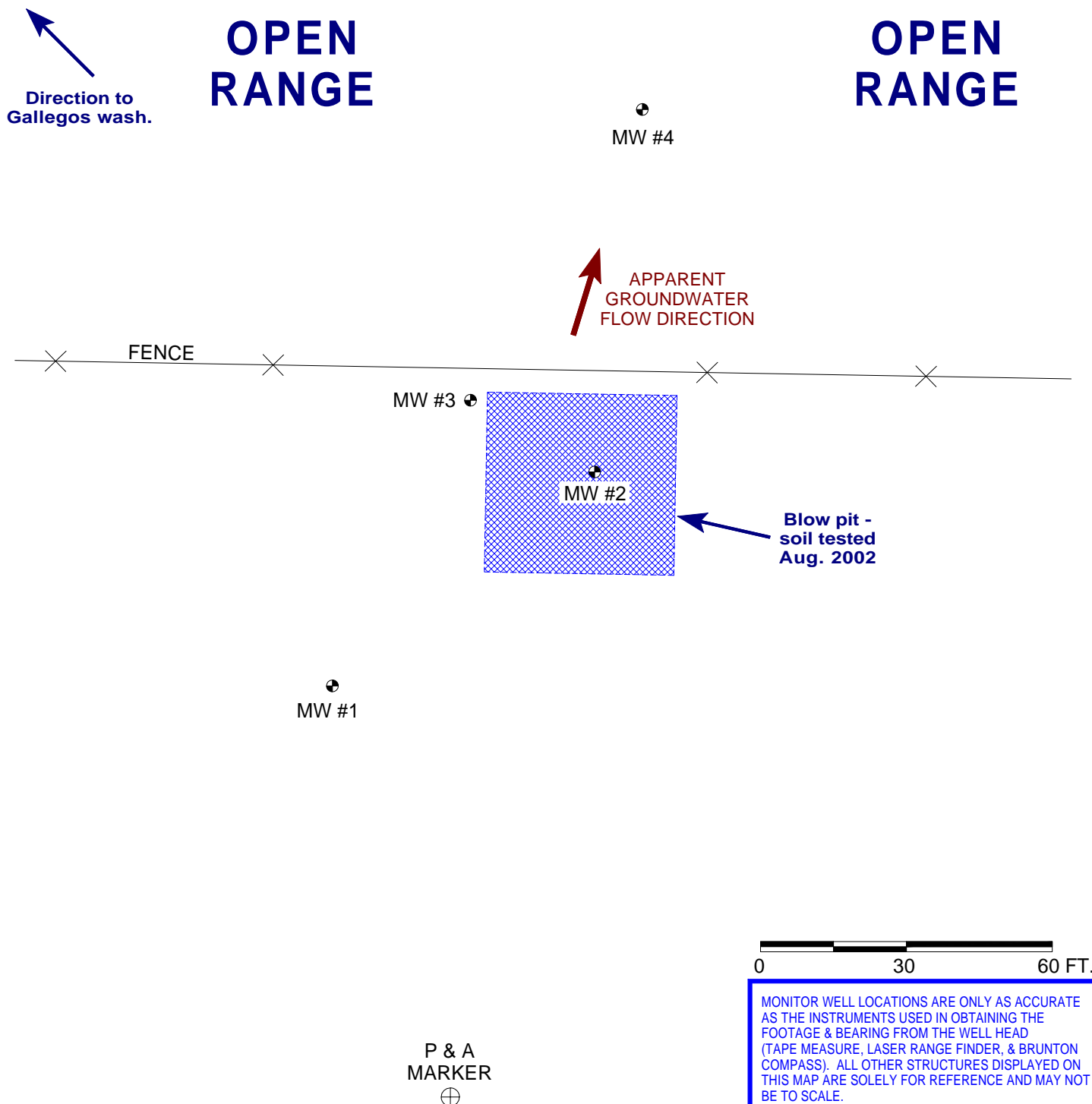
Respectfully:
Blagg Engineering, Inc.

Jeffrey C. Blagg, P.E.
President

FIGURE 1



PROPOSED
MW LOCATION



BP AMERICA PRODUCTION CO.

GCU #229E

SW/4 NW/4 SEC. 21, T28N, R12W

SAN JUAN COUNTY, NEW MEXICO

BLAGG ENGINEERING, INC.

CONSULTING PETROLEUM / RECLAMATION SERVICES

P.O. BOX 87

BLOOMFIELD, NEW MEXICO 87413

PHONE: (505) 632-1199

PROJECT: MW INSTALL.

DRAWN BY: NJV

FILENAME: GCU229E-SM3.SKF

REVISED: 09-08-11 NJV

SITE
MAP

09/11

BP AMERICA PROD. CO. GROUNDWATER LAB RESULTS

SUBMITTED BY BLAGG ENGINEERING, INC.

GCU # 229E - BLOW PIT

UNIT E, SEC. 21, T28N, R12W

REVISED DATE: March 4, 2011

FILENAME: (229E1Q11.WK4) NJV

SAMPLE DATE	WELL NAME or No.	D.T.W. (ft)	T.D. (ft)	TDS (mg/L)	COND. umhos	pH	PRODUCT (ft)	BTEX EPA METHOD 8021B (ppb)			
								Benzene	Toluene	Ethyl Benzene	Total Xylene
30-Jan-07	MW #1	34.11	42.00	730	1,200	7.13		ND	ND	ND	ND
14-Nov-06	MW #2	31.60	42.00	866	1,300	7.05		ND	25	110	1,800
30-Jan-07		31.63			1,200	6.96		ND	ND	7.9	200
25-Apr-07		31.76			1,200	6.92		ND	ND	1.0	140
23-Jul-07		31.78			1,200	6.87		ND	ND	4.1	130
15-Nov-07		31.73			1,500	6.97		ND	ND	5.1	170
30-Jan-07	MW #3	33.20	42.00	762	1,200	7.18		ND	ND	ND	ND
25-Apr-07		33.34			1,200	7.07		ND	ND	ND	ND
23-Jul-07		33.38			1,100	6.98		ND	ND	ND	ND
15-Nov-07		33.30			1,300	7.16		ND	ND	ND	ND
17-Sep-07	MW #4	23.58	36.88		1,300	7.06		1.2	ND	13	340
15-Nov-07		23.55			1,400	7.15		2.2	1.9	150	6,500
14-Apr-08		23.39			1,000	7.26		13.3	8.7	1,480	10,400
28-Aug-08		24.16			800	7.39		ND	ND	750	18,000
19-May-09		23.25			1,200	7.22		ND	23	56	1,200
17-Dec-09		22.97			1,200	7.45		ND	24	31	890
03-Mar-10		22.77			1,100	7.43		ND	9.5	2.0	56
19-May-10		22.65			1,300	7.70		ND	7.6	1.5	30
27-Jul-10		22.67			1,500	7.57		ND	4.3	ND	16
29-Oct-10		22.01			1,400	7.28		ND	ND	ND	20
16-Feb-11		22.08			1,300	7.21		ND	ND	ND	22
NMWQCC GROUNDWATER STANDARDS								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).
 - 4) NMWQCC INDICATES NEW MEXICO WATER QUALITY CONTROL COMMISSION.

COVER LETTER

Tuesday, February 22, 2011

Nelson Velez
Blagg Engineering
P. O. Box 87
Bloomfield, NM 87413
TEL: (505) 632-1199
FAX (505) 632-3903
RE: GCU #229E (#316)

Order No.: 1102537

Dear Nelson Velez:

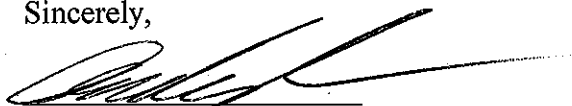
Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 2/17/2011 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,



Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX



Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-11

CLIENT: Blagg Engineering
Lab Order: 1102537
Project: GCU #229E (#316)
Lab ID: 1102537-01

Client Sample ID: MW #4
Collection Date: 2/16/2011 12:30:00 PM
Date Received: 2/17/2011
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	1.0		µg/L	1	2/18/2011 3:52:05 PM
Toluene	ND	1.0		µg/L	1	2/18/2011 3:52:05 PM
Ethylbenzene	ND	1.0		µg/L	1	2/18/2011 3:52:05 PM
Xylenes, Total	22	2.0		µg/L	1	2/18/2011 3:52:05 PM
Surr: 4-Bromofluorobenzene	123	81.3-151		%REC	1	2/18/2011 3:52:05 PM

Qualifiers:

* Value exceeds Maximum Contaminant Level
E Estimated value
J Analyte detected below quantitation limits
NC Non-Chlorinated
PQL Practical Quantitation Limit

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
ND Not Detected at the Reporting Limit
S Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Blagg Engineering
 Project: GCU #229E (#316)

Work Order: 1102537

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
---------	--------	-------	-----	--------	---------	------	----------	-----------	------	----------	------

Method: EPA Method 8021B: Volatiles

Sample ID: 5ML RB

MBLK

Batch ID: R43739 Analysis Date: 2/18/2011 9:04:31 AM

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: R43739 Analysis Date: 2/18/2011 11:38:44 AM

Benzene	22.21	µg/L	1.0	20	0	111	93.4	120
Toluene	22.52	µg/L	1.0	20	0	113	96.2	122
Ethylbenzene	21.81	µg/L	1.0	20	0	109	95	121
Xylenes, Total	66.68	µg/L	2.0	60	0	111	97.6	122

Sample ID: 100NG BTEX LCSD

LCSD

Batch ID: R43739 Analysis Date: 2/18/2011 7:52:46 PM

Benzene	21.28	µg/L	1.0	20	0	106	93.4	120	4.24	10.1
Toluene	21.62	µg/L	1.0	20	0	108	96.2	122	4.11	14.3
Ethylbenzene	20.94	µg/L	1.0	20	0	105	95	121	4.10	15.5
Xylenes, Total	64.73	µg/L	2.0	60	0	108	97.6	122	2.96	10.4

Qualifiers:

E Estimated value
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded
 NC Non-Chlorinated
 R RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name **BLAGG**

Date Received:

2/17/2011

Work Order Number **1102537**

Received by: **AMG**

Checklist completed by:

Signature

Date

Sample ID labels checked by:

Initials

Matrix:

Carrier name: **Greyhound**

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 VOA vials submitted ☐

Yes ☒

No ☐

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?

1.3°

<6° C Acceptable

If given sufficient time to cool.

Number of preserved
bottles checked for
pH:

<2 >12 unless noted
below.

COMMENTS:

Client contacted

Date contacted:

Person contacted

Contacted by:

Regarding:

Comments:

Corrective Action

Steven Moskal

From: Steve Austin <nnepawq@frontiernet.net>
Sent: Tuesday, February 26, 2019 1:33 PM
To: Steven Moskal; 'Thomas, Leigh'
Cc: 'Adeloye, Abiodun'; 'Fields, Vanessa, EMNRD'; jeffcblagg@aol.com; blagg_njv@yahoo.com
Subject: RE: [EXTERNAL] RE: FW: Gallegos Canyon Unit 229E Offsite Access

Steve,

From the notes I have about this, we had discussed monitoring wells off the pad and possibly some surface water monitoring in the adjacent drainage. I cannot find coordinates for the site, however, and cannot remember the land status. Would you please send them to me? Also, were you able to talk to Bertha about the site?

FYI, Leroy is on medical leave and we are not sure when he will return. If you have UIC questions, please direct them to Jean Bia at 505-368-1031.

--Steve

Steve Austin
Senior Hydrologist
NNEPA WQ/NPDES Program
505-368-1037

-----Original Message-----

From: Steven Moskal [mailto:Steven.Moskal@BPX.COM]
Sent: Tuesday, February 26, 2019 12:46 PM
To: Thomas, Leigh <l1thomas@blm.gov>; Steve Austin <nnepawq@frontiernet.net>
Cc: Adeloye, Abiodun (aadeloye@blm.gov) <aadeloye@blm.gov>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; jeffcblagg@aol.com; blagg_njv@yahoo.com
Subject: RE: [EXTERNAL] RE: FW: Gallegos Canyon Unit 229E Offsite Access

Whitney and Steve,

BP had a historic groundwater monitoring site located at the GCU 229E. We have successfully met closure requirements on the previous well pad (since P&A'd), but are required to demonstrate that the groundwater is not/has not been affected off pad. We proposed to drill two monitoring wells to do so. These wells are located off pad and on a parcel belonging to an unknown tribal entity.

I have contact NIIP, NAPI (Cassandra Gould), NEPA (Steve Austin) and BIA (Bertha Spencer). I had attempted several times to call Leroy Lee (NEPA), but was never able to get a hold of him, I have since lost his number.

Any help is appreciated.

Steve Moskal
Environmental Coordinator
BP America Production Co.
bpx energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179
steven.moskal@bpx.com<mailto:steven.moskal@bpx.com>

[cid:image003.jpg@01D49059.B6153800]

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From: Thomas, Leigh [mailto:l1thomas@blm.gov]
Sent: Tuesday, February 26, 2019 11:47 AM
To: Steven Moskal <Steven.Moskal@BPX.COM>
Cc: Adeloje, Abiodun (aadeloje@blm.gov) <aadeloje@blm.gov>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; jeffcblagg@aol.com; blagg_njv@yahoo.com
Subject: Re: [EXTERNAL] RE: FW: Gallegos Canyon Unit 229E Offsite Access

I do not this is the same information that I have. Refresh my memory what was going on here?

Whitney Thomas
Natural Resource Specialist
Farmington Field Office
6251 North College Boulevard
Suite A
Farmington, NM 87402
Office: 505-564-7680
Cell: 505-635-9796
email: l1thomas@blm.gov<mailto:l1thomas@blm.gov>

On Tue, Feb 26, 2019 at 11:32 AM Steven Moskal <Steven.Moskal@bpx.com<mailto:Steven.Moskal@bpx.com>> wrote:
Whitney,

Just found this old email string in trying to get offsite access at the GCU 229e to install monitoring wells. Do you have an subsequent correspondence?

Steve Moskal
Environmental Coordinator
BP America Production Co.
bpx energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179
steven.moskal@bpx.com<mailto:steven.moskal@bpx.com>

[cid:image003.jpg@01D49059.B6153800]

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From: Thomas, Leigh [mailto:l1thomas@blm.gov<mailto:l1thomas@blm.gov>]
Sent: Wednesday, April 5, 2017 9:18 AM
To: Moskal, Steven <Steven.Moskal@bp.com<mailto:Steven.Moskal@bp.com>>
Subject: Re: FW: Gallegos Canyon Unit 229E Offsite Access

Hey Steve,

I think I will need a shapefile for this project. I spoke with Steve Austin and he thinks we will have to get clearance from the Navajo Nation Historic Preservation office I should send in the clearance sheet as soon as I can to get that ball rolling.

Whitney

On Mon, Apr 3, 2017 at 3:18 PM, Moskal, Steven <Steven.Moskal@bp.com<mailto:Steven.Moskal@bp.com>> wrote:
Just the two images I had forwarded to you.

I will need property access from the surface owner to install additional groundwater monitoring wells. The site was applied for a FAN, but the existing monitoring wells need to be removed before approval of the FAN. Additional wells are need for GW site closure.....one thing leads to another.

Let me know if you absolutely need a shapefile, I can have someone round one up.

Thank you!

Steve Moskal
BP Lower 48 – San Juan – Farmington
Field Environmental Coordinator
Office: (505) 326-9497
Cell: (505) 330-9179
[cid:image002.jpg@01D4CDD1.483F3D70]

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From: Thomas, Leigh [mailto:l1thomas@blm.gov<mailto:l1thomas@blm.gov>]
Sent: Monday, April 03, 2017 3:15 PM
To: Moskal, Steven
Subject: Re: FW: Gallegos Canyon Unit 229E Offsite Access

I found the well it looks like this well is on tribal trust I may be able to get the clearances through with the Navajo Nation Historic Preservation office. Do you have a shapefile?

Whitne

On Mon, Apr 3, 2017 at 3:02 PM, Moskal, Steven <Steven.Moskal@bp.com<mailto:Steven.Moskal@bp.com>> wrote: Whitney,

Can you see if Cassandra has any info or connections with regards to obtaining offsite access to the GCU 229E? I have not received a response from calling the numbers below.

Thanks,

Steve Moskal
BP Lower 48 – San Juan – Farmington
Field Environmental Coordinator
Office: (505) 326-9497
Cell: (505) 330-9179
[cid:image002.jpg@01D4CDD1.483F3D70]

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From: Delmar, Effie [mailto:effie.delmar@bia.gov<mailto:effie.delmar@bia.gov>]
Sent: Thursday, March 16, 2017 2:45 PM
To: Moskal, Steven
Cc: Treva Henio; Shamarie Nez
Subject: Fwd: Gallegos Canyon Unit 229E Offsite Access

Good afternoon,

I apologize in not giving you a quick response. I had staff provide me boundaries of the grazing areas (range units) administered by us (BIA-Eastern Navajo Agency) in reference to the well pad, monitoring well locations, and fence line. The range units are located west and southwest of the AOI; and it looks like the fence line is not a range unit boundary.

You may need to contact NIIP (Navajo Indian Irrigation Project) at 505-325-1864 or 505-863-8217; or NAPI (Navajo Agricultural Products Industry) to acquire access.

----- Forwarded message -----

From: Nez, Shamarie <shamarie.nez@bia.gov<mailto:shamarie.nez@bia.gov>>
Date: Fri, Feb 10, 2017 at 8:48 AM
Subject: Re: Gallegos Canyon Unit 229E Offsite Access
To: "Delmar, Effie" <effie.delmar@bia.gov<mailto:effie.delmar@bia.gov>>
Cc: Roderick Yazzie <roderick.yazzie@bia.gov<mailto:roderick.yazzie@bia.gov>>, Treva Henio <treva.henio@bia.gov<mailto:treva.henio@bia.gov>>

The Area of Interest (AOI) is east of Adobe Grazing Community. Its less than 1/2 mile east of the grazing community boundary. Directly west of the AOI is canceled RU 8. To the NW of the AOI is Adobe 7 which is under grazing by David Pete. Further NW is canceled RU 6. See attached maps.

On Thu, Feb 9, 2017 at 2:52 PM, Delmar, Effie <effie.delmar@bia.gov<mailto:effie.delmar@bia.gov>> wrote:
Shamarie or Roderick,

Could you identify the adjacent lands that may include range unit(s) and permittee(s) to the locations of the groundwater monitoring wells mentioned in the forwarding email.

The company or contractor is trying to get access into a fenced area and it maybe one of our permittees.

Thank you.

----- Forwarded message -----

From: Moskal, Steven <Steven.Moskal@bp.com<mailto:Steven.Moskal@bp.com>>

Date: Wed, Feb 8, 2017 at 9:17 AM

Subject: Gallegos Canyon Unit 229E Offsite Access

To: "effie.delmar@bia.gov<mailto:effie.delmar@bia.gov>" <effie.delmar@bia.gov<mailto:effie.delmar@bia.gov>>

Hello Effie,

I had spoken to you at the BLM Farmington PMRA scoping meeting last week regarding obtaining access to BIA managed land to install groundwater monitoring wells. These wells are necessary to delineate the extents of contamination from a historic earthen pit that was discovered in August of 2002. A few monitoring wells are currently installed within the fence line to the north of the well pad.

Contact with the BIA for access has been made, but unsuccessful in the past. I have picked this up in the past year and would like to get it resolved. I have a few other sites with similar situations.

The natural gas production well has been plugged and abandoned and all equipment and facilities have been removed. The well pad has been reseeded.

Attached is a site diagram and an area map to depict the location of the site. Please let me know if you need any additional information.

Thank you,

Steve Moskal

BP Lower 48 – San Juan – Farmington

Field Environmental Coordinator

Office: (505) 326-9497

Cell: (505) 330-9179

[cid:image003.jpg@01D4CDD1.483F3D70]

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Effie Delmar
Natural Resource Manager
BIA-Eastern Navajo Agency
Division of Natural Resources
Crownpoint, NM 87313
Phone: (505) 786-6101
Fax No. (505) 786-6107

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Effie Delmar
Natural Resource Manager
BIA-Eastern Navajo Agency
Division of Natural Resources
Crownpoint, NM 87313
Phone: (505) 786-6101
Fax No. (505) 786-6107

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Whitney Thomas
Natural Resource Specialist
Farmington Field Office
6251 North College Boulevard
Suite A
Farmington, NM 87402
Office: 505-564-7680
Cell: 505-635-9796
email: l1thomas@blm.gov<mailto:l1thomas@blm.gov>

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Whitney Thomas
Natural Resource Specialist
Farmington Field Office
6251 North College Boulevard
Suite A
Farmington, NM 87402
Office: 505-564-7680
Cell: 505-635-9796
email: l1thomas@blm.gov<mailto:l1thomas@blm.gov>