

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

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.

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

11527

- 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 COMPANY OGRID #: 778  
Address: 200 Energy Court, Farmington, NM 87401  
Facility or well name: RUSSELL LS 003A  
API Number: 3004523701 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr D Section 23.0 Township 28.0N Range 08W County: San Juan County  
Center of Proposed Design: Latitude 36.65173 Longitude -107.65547 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 \_\_\_\_\_

**RCVD DEC 6 '13  
OIL CONS. DIV.  
DIST. 3**

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 (Closure Plan submittal only)  
Volume: 21.0 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 \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil  HDPE  PVC  Other \_\_\_\_\_

*Tab B*

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.

6. **Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

- Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
- Four foot height, four strands of barbed wire evenly spaced between one and four feet
- Alternate. Please specify \_\_\_\_\_

7. **Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- Screen  Netting  Other \_\_\_\_\_
- Monthly inspections (If netting or screening is not physically feasible)

8. **Signs:** Subsection C of 19.15.17.11 NMAC

- 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- Signed in compliance with 19.15.16.8 NMAC

9. **Administrative Approvals and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

*Please check a box if one or more of the following is requested, if not leave blank:*

- Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
- Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10. **Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of 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. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

- |  |   |
|--|---|
| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| 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).<br>- Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>( <i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i> )<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>( <i>Applies to permanent pits</i> )<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| 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.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> 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.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within a 100-year floodplain.<br>- FEMA map  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

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 H<sub>2</sub>S, 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.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> 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).<br>- Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> 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.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> 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.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within a 100-year floodplain.<br>- FEMA map   | <input type="checkbox"/> Yes <input type="checkbox"/> 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): Jeffrey Peace Title: Field Environmental Advisor

Signature: Jeffrey H. Peace Date: 06/14/2010

e-mail address: Peace.Jeffrey@bp.com Telephone: 505-326-9479

20.

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

OCD Representative Signature: [Signature] Approval Date: 12/12/2013  
Title: Environmental Engineer OCD Permit Number: Compliance Officer

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: 9-6-2013

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 36.85173 Longitude -107.65547 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): Jeff Peace Title: Field Environmental Advisor

Signature: Jeff Peace Date: December 5, 2013

e-mail address: peace.jeffrey@bp.com Telephone: (505) 326-9479

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

Form C-141  
Revised August 8, 2011

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company: BP	Contact: Jeff Peace
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479
Facility Name: Russell LS 3A	Facility Type: Natural gas well
Surface Owner: Federal	Mineral Owner: Federal
API No. 3004523701	

**LOCATION OF RELEASE**

Unit Letter D	Section 23	Township 28N	Range 8W	Feet from the 910	North/South Line North	Feet from the 1,090	East/West Line West	County: San Juan
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Latitude 36.65206 Longitude 107.65585

**NATURE OF RELEASE**

Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tanks – 95 bbl and 21 bbl	Date and Hour of Occurrence:	Date and Hour of Discovery:
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* Sampling of the soil and water beneath the BGT's was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chlorides below standards. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.\* BGT's were removed and the area underneath the BGT's was sampled. The excavated area was backfilled and compacted. The area over the 95 bbl is covered by the LPT and the area over the 21 bbl BGT is still within the active well area.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Jeff Peace	Approved by Environmental Specialist:	
Title: Field Environmental Advisor	Approval Date:	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	
Date: December 5, 2013	Phone: 505-326-9479	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

CLIENT: <b>BP</b>	<b>BLAGG ENGINEERING, INC.</b> P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: <b>3004523701</b>
		TANK ID (if applicable): <b>A &amp; B</b>

# FIELD REPORT:

(circle one):  BGT CONFIRMATION /  RELEASE INVESTIGATION /  OTHER:

PAGE #: **1** of **1**

SITE INFORMATION:	SITE NAME: <b>RUSSELL LS #3A</b>	DATE STARTED: <b>09/06/13</b>
QUAD/UNIT: <b>D</b> SEC: <b>23</b> TWP: <b>28N</b> RNG: <b>8W</b> PM: <b>NM</b> CNTY: <b>SJ</b> ST: <b>NM</b>		DATE FINISHED:
1/4 - 1/4/FOOTAGE: <b>910'N / 1,090'W</b>	<b>NW/NW</b> LEASE TYPE: <input checked="" type="checkbox"/> FEDERAL / <input type="checkbox"/> STATE / <input type="checkbox"/> FEE / <input type="checkbox"/> INDIAN	ENVIRONMENTAL SPECIALIST(S): <b>NJV</b>
LEASE #: <b>SF078499</b>	PROD. FORMATION: <b>MV</b> CONTRACTOR: <b>ELKHORN MBF - S. GENTRY</b>	

REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.: <b>36.65175 X 107.65569</b>	GL ELEV.: <b>6,372'</b>
1) <b>95 BGT (DW/DB) - A</b>	GPS COORD.: <b>36.65206 X 107.65585</b>	DISTANCE/BEARING FROM W.H.: <b>126.5', N28.5W</b>
2) <b>21 BGT (SW/SB) - B</b>	GPS COORD.: <b>36.65173 X 107.65547</b>	DISTANCE/BEARING FROM W.H.: <b>56', S77.5E</b>
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: <b>HALL</b>	OVM READING (ppm)
1) SAMPLE ID: <b>5 PC-TB @ 5.0' (95) - A</b>	SAMPLE DATE: <b>09/06/13</b> SAMPLE TIME: <b>1315</b> LAB ANALYSIS: <b>418.1/8015B/8021B/300.0(CI)</b>	<b>NA</b>
2) SAMPLE ID: <b>5 PC-TB @ 5.5' (21) - B</b>	SAMPLE DATE: <b>09/06/13</b> SAMPLE TIME: <b>1245</b> LAB ANALYSIS: <b>418.1/8015B/8021B/300.0(CI)</b>	<b>NA</b>
3) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	
4) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	

SOIL DESCRIPTION:	SOIL TYPE: <input checked="" type="checkbox"/> SAND / <input checked="" type="checkbox"/> SILTY SAND / <input type="checkbox"/> SILT / <input type="checkbox"/> SILTY CLAY / <input type="checkbox"/> CLAY / <input type="checkbox"/> GRAVEL / <input type="checkbox"/> OTHER	CRUSHER FINES DIRECTLY
SOIL COLOR: <b>DARK YELLOWISH BROWN</b>	BENEATH BOTH BGTS.	
COHESION (ALL OTHERS): <input checked="" type="checkbox"/> NON COHESIVE / <input type="checkbox"/> SLIGHTLY COHESIVE / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> HIGHLY COHESIVE	PLASTICITY (CLAYS): <input type="checkbox"/> NON PLASTIC / <input type="checkbox"/> SLIGHTLY PLASTIC / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> MEDIUM PLASTIC / <input type="checkbox"/> HIGHLY PLASTIC	
CONSISTENCY (NON COHESIVE SOILS): <input checked="" type="checkbox"/> LOOSE / <input type="checkbox"/> FIRM / <input type="checkbox"/> DENSE / <input type="checkbox"/> VERY DENSE	DENSITY (COHESIVE CLAYS & SILTS): <input type="checkbox"/> SOFT / <input type="checkbox"/> FIRM / <input type="checkbox"/> STIFF / <input type="checkbox"/> VERY STIFF / <input type="checkbox"/> HARD	
MOISTURE: <input checked="" type="checkbox"/> DRY / <input type="checkbox"/> SLIGHTLY MOIST / <input type="checkbox"/> MOIST / <input type="checkbox"/> WET / <input type="checkbox"/> SATURATED / <input type="checkbox"/> SUPER SATURATED	HC ODOR DETECTED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	
SAMPLE TYPE: GRAB <input checked="" type="checkbox"/> COMPOSITE # OF PTS. <b>5</b>		
DISCOLORATION/STAINING OBSERVED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____		

ANY AREAS DISPLAYING WETNESS: YES  NO  EXPLANATION - \_\_\_\_\_

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES  NO  EXPLANATION: \_\_\_\_\_

ADDITIONAL COMMENTS: \_\_\_\_\_

SOIL IMPACT 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'** NMOCD TPH CLOSURE STD: **5,000** ppm

### SITE SKETCH

**PLOT PLAN** circle: **attached**

OVM CALIB. READ. = <b>NA</b> ppm	RF = 0.52
OVM CALIB. GAS = <b>NA</b> ppm	
TIME: <b>NA</b> am/pm	DATE: <b>NA</b>

### MISCELL. NOTES

WO: **N15336888**

PO #:

PK: **ZEVH01BGT2**

PJ #: **Z2-006Q0**

Permit date(s): **06/14/10**

OCD Appr. date(s): **05/10/11**

Tank ID	OVM = Organic Vapor Meter ppm = parts per million
<b>A</b>	BGT Sidewalls Visible: <b>Y</b> / <b>(N)</b>
<b>B</b>	BGT Sidewalls Visible: <b>(Y)</b> / <b>N</b>
BGT Sidewalls Visible: <b>Y</b> / <b>N</b>	

Magnetic declination: **10° E**

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.

TRAVEL NOTES: \_\_\_\_\_ CALLOUT: \_\_\_\_\_ ONSITE: **-09/06/13**

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

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

**Project:** Russell LS # 3A

**Collection Date:** 9/6/2013 1:15:00 PM

**Lab ID:** 1309329-001

**Matrix:** SOIL

**Received Date:** 9/10/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 8015D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	9/13/2013 1:39:44 AM	9246
Surr: DNOP	138	63-147		%REC	1	9/13/2013 1:39:44 AM	9246
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	9/12/2013 4:39:40 PM	9242
Surr: BFB	97.5	80-120		%REC	1	9/12/2013 4:39:40 PM	9242
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.047		mg/Kg	1	9/12/2013 4:39:40 PM	9242
Toluene	ND	0.047		mg/Kg	1	9/12/2013 4:39:40 PM	9242
Ethylbenzene	ND	0.047		mg/Kg	1	9/12/2013 4:39:40 PM	9242
Xylenes, Total	ND	0.094		mg/Kg	1	9/12/2013 4:39:40 PM	9242
Surr: 4-Bromofluorobenzene	108	80-120		%REC	1	9/12/2013 4:39:40 PM	9242
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>JRR</b>
Chloride	31	1.5		mg/Kg	1	9/12/2013 1:55:00 PM	9279
<b>EPA METHOD 418.1: TPH</b>							Analyst: <b>BCN</b>
Petroleum Hydrocarbons, TR	36	20		mg/Kg	1	9/11/2013	9248

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	E Value above quantitation range	H Holding times for preparation or analysis exceeded
	J Analyte detected below quantitation limits	ND Not Detected at the Reporting Limit
	O RSD is greater than RSDlimit	P Sample pH greater than 2 for VOA and TOC only.
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S Spike Recovery outside accepted recovery limits	

# Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1309329

Date Reported: 9/13/2013

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB @' (21)-B

Project: Russell LS # 3A

Collection Date: 9/6/2013 12:45:00 PM

Lab ID: 1309329-002

Matrix: SOIL

Received Date: 9/10/2013 10:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 8015D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	9/13/2013 1:09:15 PM	9246
Surr: DNOP	111	63-147		%REC	1	9/13/2013 1:09:15 PM	9246
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	9/12/2013 5:08:19 PM	9242
Surr: BFB	98.2	80-120		%REC	1	9/12/2013 5:08:19 PM	9242
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.048		mg/Kg	1	9/12/2013 5:08:19 PM	9242
Toluene	ND	0.048		mg/Kg	1	9/12/2013 5:08:19 PM	9242
Ethylbenzene	ND	0.048		mg/Kg	1	9/12/2013 5:08:19 PM	9242
Xylenes, Total	ND	0.096		mg/Kg	1	9/12/2013 5:08:19 PM	9242
Surr: 4-Bromofluorobenzene	109	80-120		%REC	1	9/12/2013 5:08:19 PM	9242
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>JRR</b>
Chloride	2.0	1.5		mg/Kg	1	9/12/2013 2:32:13 PM	9279
<b>EPA METHOD 418.1: TPH</b>							Analyst: <b>BCN</b>
Petroleum Hydrocarbons, TR	23	20		mg/Kg	1	9/11/2013	9248

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	E Value above quantitation range	H Holding times for preparation or analysis exceeded
	J Analyte detected below quantitation limits	ND Not Detected at the Reporting Limit
	O RSD is greater than RSDlimit	P Sample pH greater than 2 for VOA and TOC only.
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S Spike Recovery outside accepted recovery limits	

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1309329  
 13-Sep-13

**Client:** Blagg Engineering  
**Project:** Russell LS # 3A

Sample ID	<b>MB-9279</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>9279</b>	RunNo:	<b>13343</b>					
Prep Date:	<b>9/11/2013</b>	Analysis Date:	<b>9/12/2013</b>	SeqNo:	<b>379599</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	<b>LCS-9279</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>9279</b>	RunNo:	<b>13343</b>					
Prep Date:	<b>9/11/2013</b>	Analysis Date:	<b>9/12/2013</b>	SeqNo:	<b>379600</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.5	90	110			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1309329  
 13-Sep-13

**Client:** Blagg Engineering  
**Project:** Russell LS # 3A

Sample ID: <b>MB-9248</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 418.1: TPH</b>								
Client ID: <b>PBS</b>	Batch ID: <b>9248</b>	RunNo: <b>13279</b>								
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/11/2013</b>	SeqNo: <b>377705</b> Units: <b>mg/Kg</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID: <b>LCS-9248</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 418.1: TPH</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>9248</b>	RunNo: <b>13279</b>								
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/11/2013</b>	SeqNo: <b>377706</b> Units: <b>mg/Kg</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	99	20	100.0	0	98.6	80	120			

Sample ID: <b>LCSD-9248</b>	SampType: <b>LCSD</b>	TestCode: <b>EPA Method 418.1: TPH</b>								
Client ID: <b>LCSS02</b>	Batch ID: <b>9248</b>	RunNo: <b>13279</b>								
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/11/2013</b>	SeqNo: <b>377708</b> Units: <b>mg/Kg</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	94	20	100.0	0	94.4	80	120	4.33	20	

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1309329  
 13-Sep-13

**Client:** Blagg Engineering  
**Project:** Russell LS # 3A

Sample ID <b>MB-9246</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8015D: Diesel Range Organics</b>							
Client ID: <b>PBS</b>	Batch ID: <b>9246</b>		RunNo: <b>13281</b>							
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>378499</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	12		10.00		121	63	147			

Sample ID <b>LCS-9246</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8015D: Diesel Range Organics</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>9246</b>		RunNo: <b>13281</b>							
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>378579</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	10	50.00	0	90.9	77.1	128			
Surr: DNOP	5.9		5.000		117	63	147			

Sample ID <b>MB-9288</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8015D: Diesel Range Organics</b>							
Client ID: <b>PBS</b>	Batch ID: <b>9288</b>		RunNo: <b>13281</b>							
Prep Date: <b>9/12/2013</b>	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>378850</b>		Units: <b>%REC</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	11		10.00		113	63	147			

Sample ID <b>LCS-9288</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8015D: Diesel Range Organics</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>9288</b>		RunNo: <b>13281</b>							
Prep Date: <b>9/12/2013</b>	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>378895</b>		Units: <b>%REC</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	6.0		5.000		119	63	147			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1309329  
 13-Sep-13

**Client:** Blagg Engineering  
**Project:** Russell LS # 3A

Sample ID <b>MB-9242</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8015D: Gasoline Range</b>							
Client ID: <b>PBS</b>	Batch ID: <b>9242</b>		RunNo: <b>13292</b>							
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/11/2013</b>		SeqNo: <b>378524</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	920		1000		92.1	80	120			

Sample ID <b>LCS-9242</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8015D: Gasoline Range</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>9242</b>		RunNo: <b>13292</b>							
Prep Date: <b>9/10/2013</b>	Analysis Date: <b>9/11/2013</b>		SeqNo: <b>378525</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	24	5.0	25.00	0	95.1	74.5	126			
Surr: BFB	990		1000		99.1	80	120			

Sample ID <b>MB-9268 MK</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8015D: Gasoline Range</b>							
Client ID: <b>PBS</b>	Batch ID: <b>R13320</b>		RunNo: <b>13320</b>							
Prep Date:	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>379411</b>		Units: <b>%REC</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	950		1000		95.4	80	120			

Sample ID <b>LCS-9268 MK</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8015D: Gasoline Range</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>R13320</b>		RunNo: <b>13320</b>							
Prep Date:	Analysis Date: <b>9/12/2013</b>		SeqNo: <b>379412</b>		Units: <b>%REC</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	1100		1000		110	80	120			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1309329

13-Sep-13

Client: Blagg Engineering

Project: Russell LS # 3A

Sample ID	<b>MB-9242</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>9242</b>	RunNo:	<b>13292</b>					
Prep Date:	<b>9/10/2013</b>	Analysis Date:	<b>9/11/2013</b>	SeqNo:	<b>378545</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		103	80	120			

Sample ID	<b>LCS-9242</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>9242</b>	RunNo:	<b>13292</b>					
Prep Date:	<b>9/10/2013</b>	Analysis Date:	<b>9/11/2013</b>	SeqNo:	<b>378546</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.98	0.050	1.000	0	97.7	80	120			
Toluene	0.99	0.050	1.000	0	98.7	80	120			
Ethylbenzene	0.99	0.050	1.000	0	99.1	80	120			
Xylenes, Total	3.0	0.10	3.000	0	98.7	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

Sample ID	<b>MB-9268 MK</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>R13320</b>	RunNo:	<b>13320</b>					
Prep Date:		Analysis Date:	<b>9/12/2013</b>	SeqNo:	<b>379491</b>	Units:	<b>%REC</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		107	80	120			

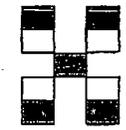
Sample ID	<b>LCS-9268 MK</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>R13320</b>	RunNo:	<b>13320</b>					
Prep Date:		Analysis Date:	<b>9/12/2013</b>	SeqNo:	<b>379492</b>	Units:	<b>%REC</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		114	80	120			

## Qualifiers:

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- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

# Chain-of-Custody Record

Turn-Around Time:  
 Standard  Rush  
 Project Name: **RUSSELL LS # 3A**  
 Project #:



## HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Client: **BLAGG ENGR. / BP AMERICA**  
 Mailing Address: **P.O. BOX 87**  
**BLOOMFIELD, NM 87413**  
 Phone #: **(505) 632-1199**  
 email or Fax#:  
 QA/QC Package:  
 Standard  Level 4 (Full Validation)

Project Manager: **NELSON VELEZ**

Accreditation:  
 NELAP  Other  
 EDD (Type)

Sampler: **NELSON VELEZ**  
 On Ice:  Yes  No  
 Sample Temperature: **10**

### Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No	BTEX + MTBE + MIBK (802.1B)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / <del>Amnot</del> )	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F, Cl, NO <sub>3</sub> , NO <sub>2</sub> , PO <sub>4</sub> , SO <sub>4</sub> )	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water - 300.1)	Grab sample	5 pt. composite sample
9/6/13	1315	SOIL	5PC-TB @ ' (95)-A	4 oz. - 2	Cool	1591629 -001	✓	✓	✓									✓		✓
9/6/13	1245	SOIL	5PC-TB @ ' (21)-B	4 oz. - 2	Cool	-002	✓	✓	✓									✓		✓

Date: 9/9/13 Time: 1437 Relinquished by: *[Signature]*  
 Date: 9/9/13 Time: 1740 Relinquished by: *Christen Walden*  
 Received by: *Christen Walden* Date: 9/9/13 Time: 1437  
 Received by: *[Signature]* Date: 09/10/13 Time: 1000

Remarks:  
**BILL DIRECTLY TO BP:**  
 Jeff Peace, 200 Energy Court, Farmington, NM 87401  
 Work Order: N15336888 Paykey: ZEVH01BGT2

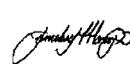
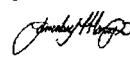
If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly noted on the analytical report.



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: **1309329**                      RcptNo: **1**

Received by/date:  **09/10/13**  
 Logged By: **Lindsay Mangin**                      9/10/2013 10:00:00 AM                        
 Completed By: **Lindsay Mangin**                      9/10/2013 10:58:44 AM                        
 Reviewed By: **mg**                      **09/10/13**

**Chain of Custody**

- 1. Custody seals intact on sample bottles?                      Yes    No    Not Present
- 2. Is Chain of Custody complete?                      Yes     No    Not Present
- 3. How was the sample delivered?                      Courier

**Log In**

- 4. Was an attempt made to cool the samples?                      Yes     No    NA
- 5. Were all samples received at a temperature of >0° C to 6.0°C                      Yes     No    NA
- 6. Sample(s) in proper container(s)?                      Yes     No
- 7. Sufficient sample volume for indicated test(s)?                      Yes     No
- 8. Are samples (except VOA and ONG) properly preserved?                      Yes     No
- 9. Was preservative added to bottles?                      Yes    No     NA
- 10. VOA vials have zero headspace?                      Yes    No    No VOA Vials
- 11. Were any sample containers received broken?                      Yes    No     # of preserved bottles checked for pH:                      (<2 or >12 unless noted)
- 12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)                      Yes     No    Adjusted?
- 13. Are matrices correctly identified on Chain of Custody?                      Yes     No
- 14. Is it clear what analyses were requested?                      Yes     No
- 15. Were all holding times able to be met? (If no, notify customer for authorization.)                      Yes     No    Checked by:

**Special Handling (if applicable)**

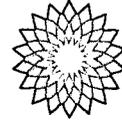
- 16. Was client notified of all discrepancies with this order?                      Yes    No    NA

Person Notified: \_\_\_\_\_ Date: \_\_\_\_\_  
 By Whom: \_\_\_\_\_ Via:  eMail  Phone  Fax  In Person  
 Regarding: \_\_\_\_\_  
 Client Instructions: \_\_\_\_\_

17. Additional remarks:

**18. Cooler Information**

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



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

August 27, 2013

Bureau of Land Management  
Mark Kelly  
1235 La Plata Hwy  
Farmington, NM 87401

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Re: Notification of plans to close/remove a below grade tank  
Well Name: RUSSELL LS 003A

Dear Mr. Kelly,

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 September 16, 2013. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at 505-326-9214

Sincerely,

Jerry Van Riper  
Surface Land Negotiator  
BP America Production Company

**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

SENT VIA E-MAIL TO: BRANDON.POWELL@STATE.NM.US

August 27, 2013

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

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

Russell LS 003A  
API 30-045-23101  
(D) Section 23 – T28N – R08W  
San Juan County, New Mexico

Dear Mr. Brandon Powell:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 21 bbl BGT that will no longer be operational at this well site.

Should you have any questions, please feel free to contact BP at our Farmington office.

Sincerely,

  
Jeff Peace  
BP Field Environmental Advisor

(505) 326-9479

**505-947-9900**

**BP AMERICA PRODUCTION COMPANY**

**RUSSELL LS 003A**

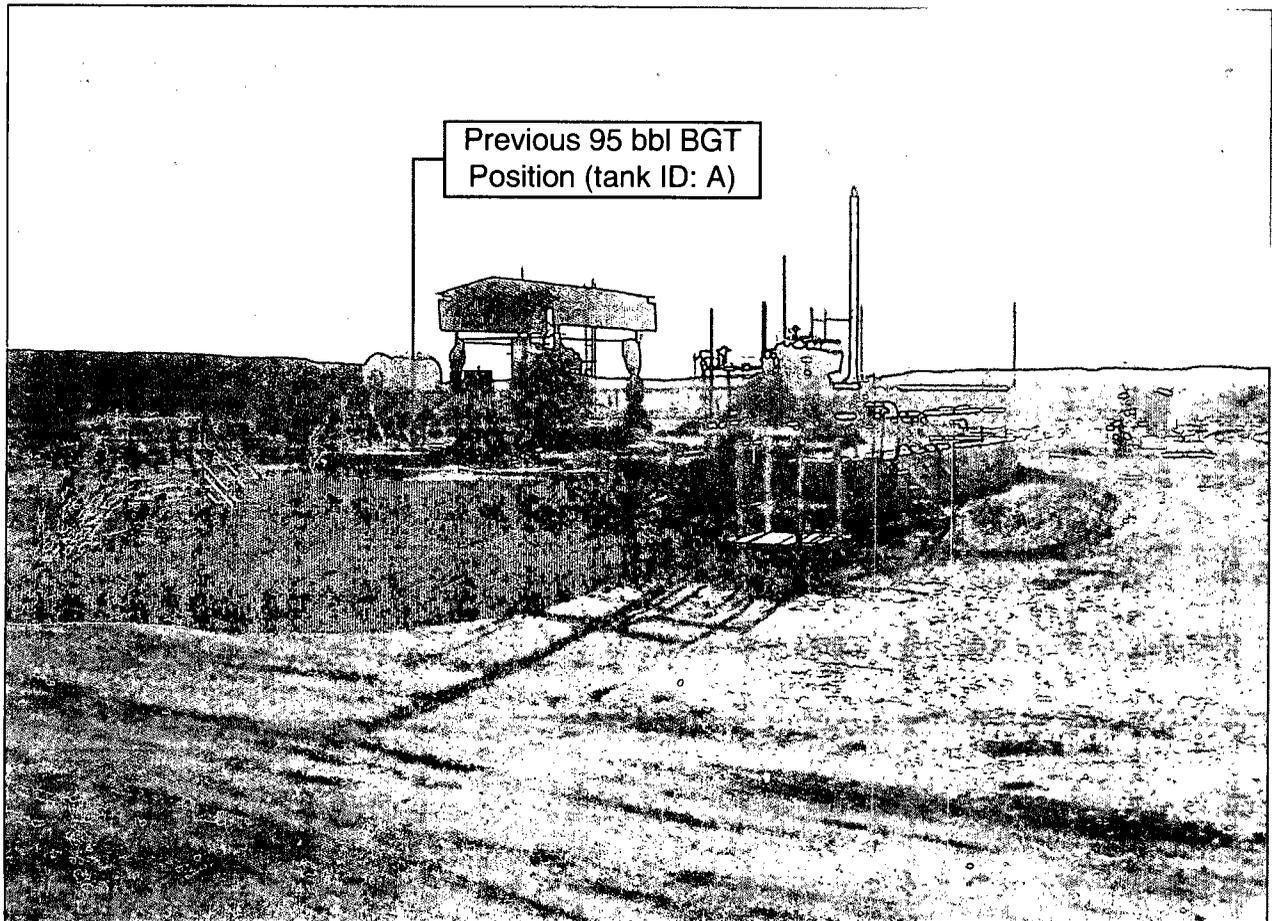
**API 3004523701 LEASE NMSF078499**

**910 FNL 1090 FWL (D) SEC 23 T28N R8W**

**San Juan County ELEV 6372**

**LAT 36° 39' 6.444"**

**LONG 107° 39' 20.376"**



**505-947-9900**

**BP AMERICA PRODUCTION COMPANY**

**RUSSELL LS 003A**

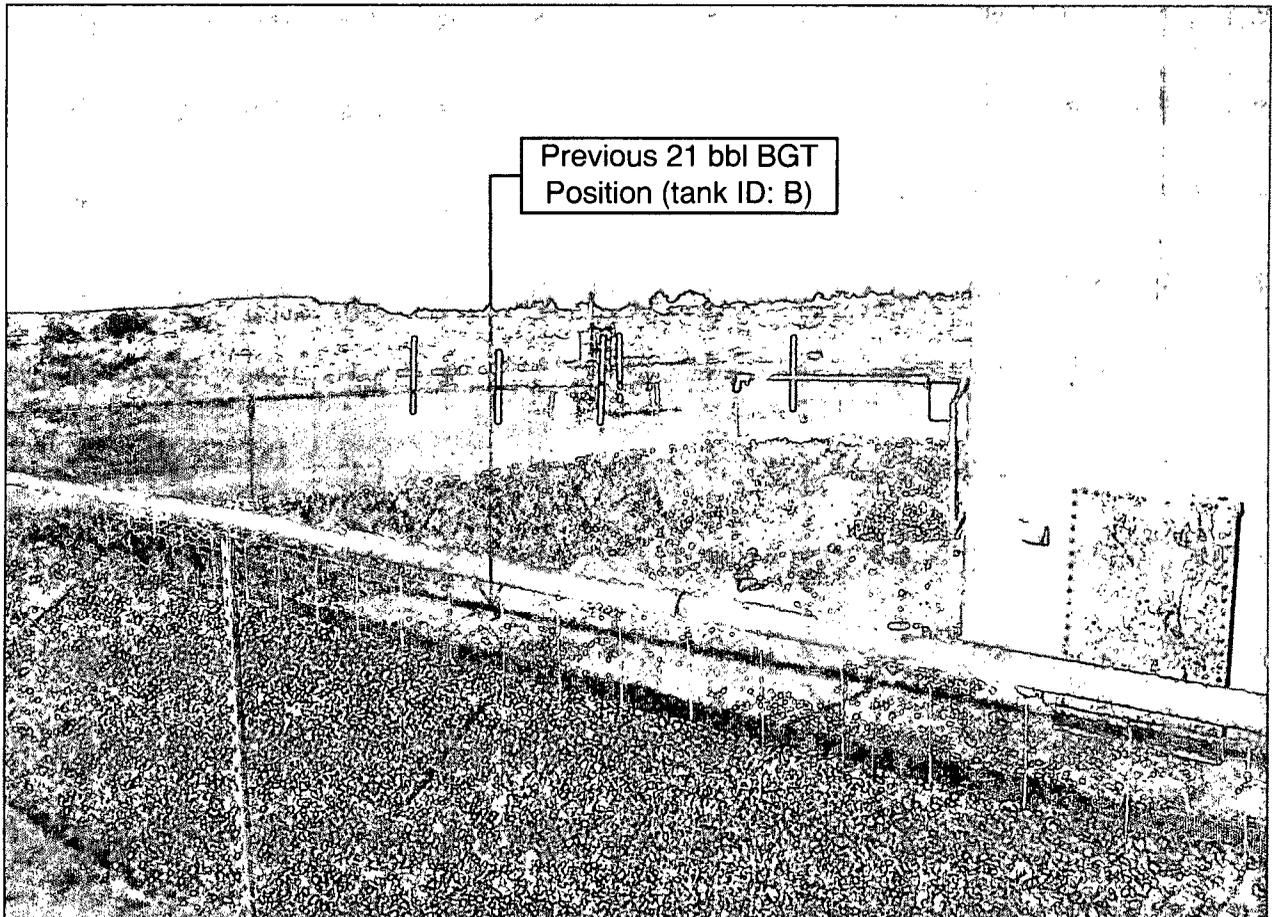
**API 3004523701 LEASE NMSF078499**

**910 FNL 1090 FWL (D) SEC 23 T28N R8W**

**San Juan County ELEV 6372**

**LAT 36° 39' 6.444"**

**LONG 107° 39' 20.376"**



BP AMERICA PRODUCTION COMPANY  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

**Russell LS 3A**  
**API No. 3004523701**  
**Unit Letter D, Section 23, T28N, R8W**

RCVD DEC 6 '13  
OIL CONS. DIV.  
DIST. 3

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

**General Closure Plan**

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.  
**Notice is attached.**
2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.  
**Notice is attached.**
3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
  - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)

- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

**All liquids and sludge in the BGT's were removed and sent to one of the above NMOCD approved facilities for disposal.**

- 4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

**The BGT's were transported to a storage area for sale and re-use.**

- 5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

**All equipment associated with the BGT's has been removed.**

- 6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method <b>95 bbl BGT</b>	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	36
Chlorides	US EPA Method 300.0 or 4500B	250 or background	31

Constituents	Testing Method <b>21 bbl BGT</b>	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	23
Chlorides	US EPA Method 300.0 or 4500B	250 or background	2

**Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total**

**petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.**

**Soil under the BGT's was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.**

7. BP shall notify the division District III office of its results on form C-141.  
**C-141 is attached.**
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.  
**Sampling results indicate no release occurred.**
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not within the active process area  
**The area under the BGT's was backfilled with clean soil. It is still within the active area. The area over the 95 bbl BGT is covered by the LPT.**
10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.  
**The area under the 95 bbl BGT is covered by the LPT and the area over the 21 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**
11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.  
**The area under the 95 bbl BGT is covered by the LPT and the area over the 21 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**
12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that

cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

**The area under the 95 bbl BGT is covered by the LPT and the area over the 21 bbl BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.**

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

**BP will seed the area when the well is plugged and abandoned.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.

**BP will notify NMOCD when re-vegetation is successful.**

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.

**Closure report on C-144 form is included.**

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

**Certification section of C-144 has been completed.**