District I
2625 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.

Proposed Alternative Method Permit or Closure Plan Application
Type of action: Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  Modification to an existing permit  Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP AMERICA PRODUCTION COMPANY OGRID#: 778
Address: 200 ENERGY COURT, FARMINGTON, NM 87410
Facility or well name: GUTIERREZ GAS COM 001A
API Number: 3004522303 OCD Permit Number:
U/L or Qtr/Qtr P Section 4 Township 29.0N Range 09W County: San Juan
U/L or Qtr/Qtr P Section 4 Township 29.0N Range 09W County: San Juan  Center of Proposed Design: Latitude 36.74868 N 3 3/3/2014 Longitude 107.77840 W NAD: 1927 X 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 RCVD JAN 31 14
Permanent Emergency Cavitation P&A
Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other DIST. 3
☐ String-Reinforced
Liner Seams:  Welded Factory Other Volume: bbl Dimensions: L x W x D
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 Scams: Welded Factory Other
Below-grade tank: Subsection 1 of 19.15.17.11 NMAC (Closure Plan submittal only)
∑ Below-grade tank: Subsection 1 of 19.15.17.11 NMAC (Closure Plan submittal only)           ∑ (BC) 2009
Volume: 95 bbl Type of fluid: Produced water OIL CONS. DIV. DIST
Selow-grade tank: Subsection 1 of 19.15.17.11 NMAC   Closure Plan submittal only
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
5.
Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Burgau office for consideration of approval.

Form C-144

Oil Conservation Division

Page 1 of 5

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				
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 19.15.3.103 NMAC				
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 consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	office for			
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 accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the approfifice or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	priate district pproval.			
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ 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).  - Topographic map; Visual inspection (certification) of the proposed site	Yes No			
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  (Applies to temporary, emergency, or cavitation pits and below-grade tanks)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA			
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  (Applies to permanent pits)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ 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.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	Yes No			
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No			
Within an unstable area.  - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No			
Within a 100-year floodplain FEMA map	☐ Yes ☐ No			

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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)	
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	
Proposed Closure: 19.15.17.13 NMAC Method – 19.15.17.13E – Protocols and Procedures included in attached Closure Plan 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	

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 indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two							
facilities are required.	Diomagal Equility Dannit Musekan						
Disposal Facility Name: Disposal Facility Permit Number: Disposal Facility Permit Number:							
Disposal Facility Name: Disposal Facility Permit Number:							
Yes (If yes, please provide the information below) \( \sum \) No	cur on or in areas that will hot be used for future serv	ice and operations?					
☐ Soil Backfill and Cover Design Specifications based upon the appropriate ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsect							
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the provided below. Requests regarding changes to certain siting criteria may require considered an exception which must be submitted to the Santa Fe Environmenta demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC.	e administrative approval from the appropriate distr l Bureau office for consideration of approval.  Justi,	rict office or may be					
Ground water is less than 50 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Dat	a obtained from nearby wells	Yes No					
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database scarch; USGS; Dat	a obtained from nearby wells	☐ Yes ☐ No ☐ NA					
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Dat	a obtained from nearby wells	☐ Yes ☐ No ☐ NA					
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other sig lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	nificant watercourse or lakebed, sinkhole, or playa	☐ Yes ☐ No					
Within 300 feet from a permanent residence, school, hospital, institution, or church - Visual inspection (certification) of the proposed site; Aerial photo; Satellite		☐ Yes ☐ No					
Within 500 horizontal feet of a private, domestic fresh water well or spring that les watering purposes, or within 1000 horizontal feet of any other fresh water well or so NM Office of the State Engineer - iWATERS database; Visual inspection	pring, in existence at the time of initial application.	Yes No					
Within incorporated municipal boundaries or within a defined municipal fresh wat adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approx	·	☐ Yes ☐ No					
Within 500 fect of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site							
Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Mining	and Mineral Division	☐ Yes ☐ No					
Within an unstable area.  - Engineering measures incorporated into the design; NM Bureau of Geolog Society; Topographic map	y & Mineral Resources; USGS; NM Geological	Yes No					
Within a 100-year floodplain FEMA map		☐ Yes ☐ No					
- FEMA map  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 19.15.17.13 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 19.15.17.13 NMAC  Protocols and Procedures - based upon the appropriate requirements of Subsection F 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 I 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							

<ul> <li>Operator Application Certification:</li> <li>I hereby certify that the information submitted with this application is true, accurate a</li> </ul>	nd complete to the heat of my knowledge and heliof
Name (Print): BUDBY SHAW	Title: ENVIRONMENTAL COORDINATOR
Signature: Sudely Slyw	Date: NOVEMBER 19, 2009
e-mail address: buddy.shaw@bp.com	Telephone: (505) 326-9200
OCD Representative Signature:	only)/ OCD Conditions (see attachment)  att     3/3/2014  Approval Date: 3////  sm plance Office( CD Permit Number:
Closure Report (required within 60 days of closure completion): Subsection K of Instructions: Operators are required to obtain an approved closure plan prior to im The closure report is required to be submitted to the division within 60 days of the consection of the form until an approved closure plan has been obtained and the closure	plementing any closure activities and submitting the closure report.  ompletion of the closure activities. Please do not complete this
Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternative If different from approved plan, please explain.	Closure Method
	fluids and drill cuttings were disposed. Use attachment if more than sposal Facility Permit Number:sposal Facility
Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique	
Closure Report Attachment Checklist: Instructions: Each of the following items 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 367468  Longitude	must be attached to the closure report. Please indicate, by a check ールフックの名字の NAD: □1927 図 1983
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report 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 Governmental Advisor
Signature: YKK Reace  a mail address: neace a settler (2) bp. com	Date: January 29, 2014  Telephone: (505) 326-9479
a mail address to Clark, is a struck of the Coll	Tolenhone: IAUT/ 17A-77 17

### BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### BELOW-GRADE TANK CLOSURE PLAN

#### Gutierrez Gas Com 1A API No. 3004522303 Unit Letter P, Section 4, T29N, R9W

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 approve 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.
  - No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT is removed during plugging and abandoning operations. Closure notices will be made for all BGT closures from this point forward.
- 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.

No notice was made due to misunderstanding of the notice requirements. BP did not think notice was necessary if BGT is removed during plugging and abandoning operations. Closure notices will be made for all BGT closures from this point forward.

- 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 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 was 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 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	Release Verification	Sample
		(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	0.07
TPH	US EPA Method SW-846 418.1	100	209
Chlorides	US EPA Method 300.0 or 4500B	250 or background	25

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 was sampled and BTEX and chloride levels were below the stated limits. TPH from method 418.1 showed 209 mg/kg, which is above the stated limit of 100 mg/kg, but TPH from method 8015 resulted in 18 mg/kg, which is well below the 100 mg/kg limit. 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 with in the active process area

The area under the BGT was backfilled with clean soil and will be reclaimed when the rest of the well pad is done.

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.

This area will be reclaimed when the rest of the well pad is done 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.

This area will be reclaimed when the rest of the well pad is done 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.

This area will be reclaimed when the rest of the well pad is done 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 site is reclaimed.

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 revegetation.

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.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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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: Jef	f Peace				
Address: 20	0 Energy	Court, Farmi	ngton, N	M 87401		Telephone 1	No.: 505-326-94	79			
Facility Nat	ne: Gutier	rez Gas Con	1 1 A			Facility Typ	e: Natural gas v	vell			
Surface Ow	ner: Feder	al		Mineral C	Owner:	Federal		API No	. 3004522	303	
				LOCA	ATIO	N OF RE	LEASE				
Unit Letter P	Section 4	Township 29N	Range 9W	Feet from the 790		/South Line	Feet from the 790	East/West Line East	County: S	an Juar	ı
		Lat	itude3	66.74868		Longitude	e107.77840				
				NAT	URE	OF REL		- <del></del>			
Type of Rele		<del></del>	0.7.1.1				Release: N/A		Recovered: 1		
		w grade tank –	95 bbl				lour of Occurrenc	e: Date and	Hour of Dis	covery	<u>:</u>
Was Immedi	ate Notice (		Yes [	No 🖾 Not R	equired	If YES, To	Whom?				
By Whom? Date and Hour											
Was a Watercourse Reached?  ☐ Yes ☒ No  If YES, Volume Impacting the Watercourse.											
If a Watercon	irse was Im	pacted, Descr	ihe Fully *	<u> </u>							
							the BGT was do	ne during removal (	to ensure no	soil in	ipacts from
		•					nderneath the BG es final reclamatio	T was sampled. The	he excavated	d area v	vas
regulations a public health should their cor the environ	II operators or the envi- operations homent. In a	are required to ronment. The nave failed to a	o report ar acceptance dequately OCD accep	nd/or file certain rece of a C-141 reporting and r	elease nort by the emediat	otifications a e NMOCD m e contaminati	nd perform correct arked as "Final Ro on that pose a thro	nderstand that purs tive actions for rele eport" does not reli eat to ground water responsibility for co	eases which eve the oper , surface wa	may er ator of ter, hu	danger Tiability man health
Signature:	ff	Peace				A	_	SERVATION	DIVISIC	<u> N</u>	
Printed Name	e: Jeff Peace	e				Approved by	Environmental Sp	pecialist.			
Title: Field E	Title: Field Environmental Advisor				Approval Dat	re:	Expiration l	Date:			
E-mail Addre	ess: peace.je	effrey@bp.cor	n			Conditions of	Approval:		Attached	П	

Date: January 29, 2014

Phone: 505-326-9479

<sup>\*</sup> Attach Additional Sheets If Necessary

חח	BLAGG EN	IGINEERING, IN	 C.		
CLIENT: BP	P.O. BOX 87, BL	•		API#: 3004522303	
		632-1199			
PIPI B BEBART	DCT CONFIDMATION TEMP	DIT OL OCUDE / DEL EACE IND/E	COTICATION		
FIELD REPORT:		PIT CLOSURE / RELEASE INVE A WELL	STIGATION	PAGE No: 1 of 1	
SITE INFORMATION	J: SITE NAME: <b>GUTI</b>	ERREZ GC #1A		DATE STARTED: 12/03/09	
QUAD/UNIT: P SEC: 4 TV	P: <b>29N</b> RNG: <b>9W</b> PM	NM CNTY: SJ ST:	NM	DATE FINISHED:	
QTR-QTR/FOOTAGE: <b>SE/SE</b>	<b>790'S/790'E</b> LEAS	E TYPE: FEDERAL STAT	E / FEE / INDIAN	ENVIRONMENTAL	
LEASE #: <b>SF076337</b>	PROD. FORMATION: MV	CONTRACTOR: ELK	HORN	SPECIALIST: JCB	
REFERENCE POINT	Γ: WELL HEAD (W.H.)	GPS COORD.: 3	6.74882 X 107.778	302 GL ELEV.: 5,636'	
1) 95 BGT		36.74868 X 107.77840		ARING FROM W.H.: 108', S77W	
2)	GPS COORD.:		DISTANCE/BE	ARING FROM W.H.:	
3)				ARING FROM W.H.:	
4)				ARING FROM W.H.:	
,	GPS COORD.:			ARING FROM W.H.;	
LAB INFORMATION					
1) SAMPLE ID:	CHAIN OF CUSTOD  SAMPLE DATE:	, ,	8513 1447 LAB ANALYSIS:	TPH/BTEX/CL	
		·			
SAMPLE ID:      SAMPLE ID:					
4) SAMPLE ID:					
5) SAMPLE ID:					
<del></del>	<del></del>				
SOIL DESCRIPTION	<del></del> J				
SOIL COLOR: DARK Y COHESION (ALL OTHERS): NON COHESIVE/ SLIGHTI	YELLOWISH ORANGE  Y COHESIVE / COHESIVE / HIGHLY COHE	DISCOLORATIO	N/STAINING OBSERVED	: YES/NO EXPLANATION -	
CONSISTENCY (NON COHESIVE SOILS):					
PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC /		TIO ODOI (DETE	CTED: YES NO EXPL	ANATION -	
DENSITY (COHESIVE CLAYS & SILTS): SOF MOISTURE: DRY (SLIGHTLY MOIST /		1	GRAB / COMPOSITE - #	OF PTS 5	
ADDITIONAL COMMENTS: 95 BBL	BGT SET IN 14' X 14' WOOD I	INED CELLAR - SIDEWALL	S EXPOSED - ON PVC L		
PULL TANK WITH CRANE & SAMPLE BELOW LINER WITH BACKHOE.					
EXCAVATION DIMENSIONS (if applicable	e): <b>NA</b> ft. X	NA ft. X NA	ft. cubic yards ex	cavated (if applicable):	
SITE SKETCH				PLOT PLAN	
				circle: Attached	
			⊕ 'XA	MISCELL. NOTES	
14'	S.P.D.		RKER -		
l ————————————————————————————————————			-		
		•			
14' (x x x)			-		
<u> </u>			_		
	WOOD				
TANK FOOT	CELLAR		_		
PRINT	TOTAL DEPTH 7' BELOW GRADE				
			_		
			[_		
X = COMPOSITE SAMPLE F		B-DELONATU TEGT HOLE			
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVA T.B. = TANK BOTTOM; PBGTL = PREVIOUS E					
TRAVEL NOTES: CALLOUT:			2/03/09		



### **EPA METHOD 418.1** TOTAL PETROLEUM **HYDROCARBONS**

<u>Client:</u>	,Bíjágg/BP	Project/#:	94034-0010
Sample ID:	95-BGT:5-PT @-7"	Date Reported.	12-08-09
<u>Ľaborátory Numběr:</u>	526/15	Date Sampled:	12-03-09
@halmof@ustody.No:	8513	Date Received:	12-04-09
Sample Matrix.	Şõll	Date Extracted:	12-07-09
Preservative:	Cool'	Date Analyzéd:	12-07-09
©ondition;	lntact	Analysis Needed	TPH-418.1

	****		Det.
	Concentration:		Limit
Parameter	(mg/kg)	Marian.	 (mg/kg)
			*- 6

Total Petroleum Hydrocarbons

8:38

ND = Parameter not detected at the stated detection limits

References:

Method 41811, Rétroleum Hydrocarbons, Total Recoveráble, Chémical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978.

Comments:

Guiterrez GC 1A



# EPA METHÓD 8021 AROMATIC VOLATILE ORGANICS

Ĉljeńt:	, <u>B</u> lagg/BiR	¹₽rojećt#:	94034-0010
Sample ID:	<sup>'95</sup> 'BGT 5-Pਜੋ @ 7"	Date Reported:	12±08-09
Laboratory Number:	52615	·Date Sampled:	12-03-09
Chain of Custody:	8513	Date:Received:	12-04-09
Sample Matrix:	ĝgil <sup>.</sup>	Date Analyzed	12-07-09
Preservative:	Cool	Date Extracted:	12-04-09
Condition:	lintact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Deti Limit (ug/Kg)	
. <del>M</del> essage 2	ATTO:	à à	
Benzene	ND	0.9	
Toluëne	12.1	1,0	
Ethylbenzene	16.9	1Q·	
p,m-Xylene	23.0	1,2	
o-Xylene	16.9°	0.9	
Total BTEX	68.9°		

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	99.0 %
	1,4-difluoropenzene	99.0 %
	Bromochlorobenzene	99.0 %

References:

Method 5030B, Purge-and Trap, Test Methods for Evaluating Solid Waste, SW-846, USERA,

Décember 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846,

USEPA December 1996:

Comments:

Guiterrez GC 1A

Analyst

Review



#### Chloride

Çlient≑ Şample (D).	¹Biagg/BP '95'BGT 5⊧PT.@ 7''	Broject# Date Reported:	94034-0010 12:08-09
Lab⁺iD#:	35 <u>261</u> 5	Date Sampled:	12-03-09
Sample Matrix:	Soil	Date Received:	12-04-09
Preservative:	<b>်</b> င်စုံရဲ၊	Date Analyzed:	12-08-09
Condition:	Intact	Ĉĥain of Ĉuŝtodŷ:	8513

Parameter

Concentration (mg/Kg)

Total Chloride

25

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 4983. Standard Methods For The Examination of Water And Waste Water, 18th ed., 1992.

Comments:

Guiterrez GC 1A



# EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	Blagg/BP	Project#	94034-0010
Sample ID:	95 BGT 5-Pit @ 7	Date Reported:	12-08-09
Laboratory Numbers	52615	Date Sampled	12-03-09
Chain of Custody No:	8513	Date Received:	12-04-09
Sample Matrix:	Šöj <sup>)</sup>	Date-Extracted:	12-04-09
Preservative:	Čool	Date Analyzed:	12-07-09
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det Limit (mg/Kg)
Gasoline Range (C5 - C10)	46.7	0.2
Diesel Range (C10 - C28)	1.3	Q: <del>1</del>
Total Petroleum Hydrocarbons	18:0	0.2

ND:- Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments

**Guiterrez GC 1A** 

Analyst

Review Beview

# CHAIN OF CUSTODY RECORD

8513

Client			Project Name / L	ocation:	· · · · · · · · · · · · · · · · · · ·	-		• ; ···································		·	47 · · · · · · · · · · · · · · · · · · ·	······································	-	ANAL	YSIS.	PAR	ÀME	TERS		<del></del>			4
BAGO /BP			GUITERIL	3 G	C 1A				1	<u></u>		· · · · · ·		<del>-</del>		<u></u>		· · ·	nia i	i. ·	, <u></u>		ا جست
Client Address			Sampler Name:						2)	)21)	(00										,		
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u> </u>		J 16	LAG	3 <sub>7</sub>			<u> </u>	801	9,0	1.82	Sign			يق								پنور
Client Phone No.:			Client No.: 9403						TPH (Method:8015)	BTEX (Method:8021)	VOC (Method:8260)	RCRA 8 Metals	Cation / Anion		TOLP WITH HIP		TPH (418.1)	JÓE JÓE				Sample:Cool	Sample Intact
Sample No./	Sample	Samp	1/20/10/	1	imple latrix	No./Volume of Containers	Pre	servativ	PH ()	ŢĒX	000	CRA	afion	P.C.	CLP.	PAH	Hd.	CHLORIDE		•		sampl	Sampl
95 Bet	12/3/0°7	144	752615	Soil Solid	Šludge:	Containers		194	+ بر ∖	7-	<u>  &gt; </u>	) (OE)	. O	a.	1 1	, O.S	X	<i>y</i>			, ,,,,	4	Y
5-pt 0.7	107	gert and	( 32 2 3	Soil	'Aqueous Sludge						1-23	-								1		t. 	<u>-                                    </u>
		· · · · · · · · · · · · · · · · · · ·		Solid.	Aqueous Slüdge	1	-		1	-	4	-			-	-			i	<u>}                                    </u>			<del>-</del>
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	-			Solid Soll	Aqueous Sludge		-		-		-	•				-	<u> </u>	-		5			
	L	<u> </u>		Solid	Aqueous	<u> </u>	1						<u> </u>		<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u></u>			:	imé
Relinquished by: (Sign	ature).				Date	Time: 12404		Receiv	ed by	Sigi):: سر	nature	學		18	<u>ج</u> جينا			~~			āte 4/09	1	•
Reling ashed by (Sim	ature/		······································		7.2.1			Recei	ed by	. ( <b>S</b> [g]	navore	);	·	*		(	<u>ک</u>						<del></del>
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						en	na	lylic	al L	abo	rate	ory.											
			:57961	IS Highway	v.64(e Farmi	adion MM8		••					ch-inc	com.									



# EPA METHOD 418,1 TOTAL PETROLEUM HYROGARBONS GUALITY ASSURANCE REPORT

Client: Sample ID: Laboratory Number Sample Matrix: Preservative: Condition:	य	QA/QC QA/QC 12-07-TPH_QA/ Frèon-113 N/A N/A	QC:52614.	Date Sampled Date Analyzed Date Extracted	Project;# Date Reported: Date Sampled:: Date Analyzed: Date Extracted:: Analysis Needed:	
Calibration	146a Date. 11-23-09	C-Cal Date 12-07-09	ĿÇá⊩RF: <b>1,750</b>	C-Căl RF: <b>1,670</b>	% Difference 4.6%	Accept Range.
Blank Conc. (m	g/Kg)		Concentration ND		Delection Lim	ật.
Duplicate Conc TPH	. (mg/Kg)		Sample <b>16.8</b>	Duplicate 15.4	% Difference 8:3%	Accept. Range +/- 30%
Spike Conc. (m	g/Kg)	Sample 16.8	Spike Added	Spike Result	%.Recovery	Accept Range 80 - 120%;

ND = Parameter not detected at the stated detection limit:

References:

Methodi 418/1, Retroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USERA Storet No. 4551, 1978.

Comments:

QA/QC for Samples 52614-52616, 52621-52623

Analyst 6

Aniatha of Weller



#### EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

·Člient:	N/A	Project #3	N/A
Sample ID:	12-07-BT • QA/QC	Date Reported	12-08-09
Laboratory Number:	52614	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	'N/A	Date Analyzed.	12-07-09
Condition:	Ä/A	Ānalysis:	BTEX.

Calibration and , Detection (Limits (ag/L))	. Ecologia	@_Cal,RF Accept Ran	%Diff.	Elank 1.	Detect.
Benzene	¹1́±3883££¥0006	1:3912E+006	0:2%	ŅD:	0:1
Toluene.	1.2945E+006	1,2971E+006	0.2%	ND	0.1
Ethylbenzene	1,1675E+006	1:1699E+006	0.2%	NĎ	Q:AF
p <sub>i</sub> m-Xylene	,2.94,72E+006	2:953,1E+006	0.2%	ND	0.1
o-Xylene	1.1033E+006	1:1055E+006	0.2%	ND.	Q.1:

Duplicate Conc. (ug/Kg).		plicate"	%Diff	Accept Range	Detect Uniting
Benzene	ŇĎ	ND	0:0%	0 - 30%	<b>0</b> ;9
Toluene	ND	ND	0:0%	.0 - 30%	1.0
Ethylbenzene-	ŅĎ	NĞ	0:0%	0 = 30%.	1.0
p,m-Xylene	:ND	ND	0.0%	0 - 30%	4. <b>2</b>
ò-Xylene	ŅĎ	ND	0.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample Amo	unt-Spiked. "Spik	ed Sample	% Recovery	Accept(Rangeol.),
Beńżeńe	÷ŅĎ	50:0:	50:4	101%	39°-150°
Toluene	ΝĎ	50.0	46.1	92.2%	46 - 148
Éthylbenzene	'ND	50:0	45.3	90.6%	32 - 160
p;m-Xylene	ŅĎ	100	85.0	85:0%	46 - 148
ō-Xylene	ND	50.0	51.5	103%	46 - 148

(ND)-Parameter not detected at the stated detection limit.

References:

Method 5030B, Rurge and Trao, Test Methods for Evaluating Solid Waste, SW-846, USEPA:

December 1996

Meifico 8021B, Archietic, and Halogenated Volatiles by Gas Chromatography, Using:

Rhotolonization and Halogenated Volatiles by Gas Chromatography, Using:

Rhotolonization (Archiet Report 1996).

Comments:

QA/QC for Samples 52614 - 52616, and 52620 - 52622

Analyst

Review



# EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

## Quality Assurance Report

· Glient:	(QA/QC,		Rioject#		N/A
Şample ID:	12-07-09 QA/	ΩĆʻ	Datê Reported		12-08-09
Laboratory Number:	52613		Date Sampled		NŽĄ
Sample Matrix:	Methylene Chlo	íride:	Date Received		N/A.
Preservative:	Ň/Â		Date Analyzed		12-07-09
Condition:	N/A		Analysis Reques	ted:	TBH
	- Kili Çal Date	Gal Res	ViG-CatiRF8/75	% Difference	Accept Range
Gasoline Range C5 - C10.	05-07-07	1.0365E+003		0.04%	0 - 15%
Diesel Range C10 C28	05-07-07	1:02/18E+003		0.04%	0`15%
Blank Conc. (mb/L: mg/kg)	in a contract of the contract			e e e e e e e e e e e e e e e e e e e	
	(Marie Care Property)	Concentration		Detectioniting	
Gasoline Range C5 - C10		'ND		0.2	
Diesel Range C10 - C28		ND		0.1	
Total Petroleum Hydrocarbons		ЙĎ		0.2.	
Duolicate Conc. (mg/kg)	Samule	Duplicate	% Differences	Accept Range	
Gasoline Range C5 = C10	ND	ND	0/0%.	030%	
Diesel Range C10 - C28	ND	ND.	0.0%	0 - 30%	
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery.	Accept Range
The state of the s		and the same of th			Marie Commission (Commission of Commission o

ND - Rarameter not detected at the stated detection limit.

References:

Gasoline Range C5 - C10

Diesel Range C10 - C28

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

228

252

91.2%

101%

75 - 125%

75 - 125%

250

250

SW-846; USEPA, December 1996.

Comments:

QA/QC for Samples 52613 - 52622

ND

ND

Analyst



