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

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or

Santa Fe, NM 87505

Proposed Alternative Method Permit or Closure Plan Application NS. DIV DIST. 3
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
lease 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 avironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
DD Amorica Draduction Commany
Operator: BP America Production Company OGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Florance O 20
API Number:3004509376OCD Permit Number:
U/L or Qtr/QtrB Section24 Township30N Range _9W County:San Juan
Center of Proposed Design: Latitude36.80093 Longitude107.72799 NAD: □1927 ⊠ 1983
Surface Owner: ⊠ Federal □ State □ Private □ Tribal Trust or Indian Allotment
2.
Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management ☐ Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
☐ String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D
3.
Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
Volume:95.0bbl 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 _Single walled/double bottomed
Liner type: Thicknessmil
4.
Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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 institution or church)	, hospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
6.	
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)	
7. 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	
Signed in comprisince with 15.15.10.6 NVIAC	
8. Variances 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: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.	
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9.	
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 accematerial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells	Yes No
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	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. (Does not apply to below grade tanks)	☐ Yes ☐ No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)	☐ Yes ☐ No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	I ICS I NO
 Within an unstable area. (Does not apply to below grade tanks) 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. (Does not apply to below grade tanks) - FEMA map	Yes No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured	
from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;	☐ Yes ☐ No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	Yes No
 application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
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 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, 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 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	NMAC 15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit 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 doc attached. 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 A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

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 to 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 Laak Detection Design - 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 ₂ 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	he documents are
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 Multi-wel 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	Fluid Management Pit
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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 C 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 H of 19.15.17.13 NMAC	
15. 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 so provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	Yes No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; 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	

Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 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
	□ Vas □ Na
Within a 100-year floodplain FEMA map	
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 E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19 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 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements 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 cand 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 H of 19.15.17.13 NMAC	.11 NMAC .15.17.11 NMAC
17. 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 bel	ief
Name (Print): Title:	
Signature: Date:	
e-mail address:	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 8/3/3 Title: OCD Permit Number: 19. Closure Report (required within 60 days of closure completion): 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do no section of the form until an approved closure plan has been obtained and the closure activities have been completed.	
☐ Closure Completion Date:4/5/2011	
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-le ☐ If different from approved plan, please explain.	oop systems only)
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in 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 for private land only) 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 36.80093 Longitude -107.72799 NAD: 192	ndicate, by a check

Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure rebelief. I also certify that the closure complies with all applicable closure requirements.	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Name (Print):Jeff Peace	Date:June 2, 2015
e-mail address:peace.jeffrey@bp.com	Telephone:(505) 326-9479



BP America Production Company

200 Energy Court Farmington, NM 87401 Phone: (505) 326-9200

Phone: (505) 326-9200

July 29, 2015

OIL CONS. DIV DIST. 3

JUL 3 1 2015

Mr. Jonathan Kelly Compliance Officer New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, NM 87410

Re: Florance O 20; 95 bbl BGT, Tank A

API No. 3004509376; Unit letter B, Section 24, T30N, R9W

Dear Mr. Kelly:

Attached is the "Below-Grade Tank Closure Plan" document to revise and correct the closure report package for the 95 bbl BGT Tank A at this site. The original closure report package for the BGT included a "Closure Plan" document that stated the area over the BGT that was closed was covered by a low-profile tank (LPT). This was incorrect. The area over the BGT that was closed is covered by a new below grade tank, and the attached document should replace the original one submitted with the closure report package.

If you have any questions or concerns, please contact me at (505) 326-9479 or at peace.jeffrey@bp.com.

Sincerely,

Jeff Peace, P. E.

If Peace

Field Environmental Coordinator

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Florance O 20, BGT Tank A (95 bbl)

API No. 3004509376

Unit Letter B, Section 24, T30N, 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 BGT notice requirements at that time.
- 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 BGT notice requirements at that time.
- 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
	95 bbl BGT, Tank A	(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	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

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 TPH, BTEX and chloride 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 with in the active process area

The area under the BGT was backfilled with clean soil and is still within the active well area.

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 over the BGT is covered by the new BGT and 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 over the BGT is covered by the new BGT and 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 over the BGT is covered by the new BGT and 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 as part of final reclamation.

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 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

Revised August 8, 2011

Form C-141

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.

			Kele	ease Notific	catioi	n and Co	orrective A	ction	1			
						OPERA	ГOR		Initia	al Report	\bowtie	Final Report
Name of Co	ompany: B	P				Contact: Jef	f Peace			1		
		Court, Farmi	ngton, N	M 87401		Telephone 1	No.: 505-326-94	179				
Facility Nar	ne: Floran	ce O 20				Facility Typ	e: Natural gas	well				
Surface Ow	ner: Feder	al		Mineral C	wner:	Federal			API No	. 30045093	376	
				LOCA	TIO	N OF REI	LEASE					
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/	West Line	County: S	an Juan	
В	24	30N	9W	990	North		1,650	East				
		Lati	tude3	6.80093		Longitud	e107.72799_					
				NAT	URE	OF RELI	EASE					
Type of Rele	ase: none					Volume of	Release: N/A		Volume R	Recovered: N	V/A	
		v grade tank –	95 bbl, Ta	ank A		Date and H	our of Occurrence	ce:	Date and	Hour of Dis	covery:	
Was Immedia	ate Notice (_		If YES, To	Whom?					
			Yes	No Not Re	equired							
By Whom?						Date and H	our					
Was a Water	course Read					If YES, Vo	lume Impacting t	the Wate	ercourse.			
			Yes 🛛	No								
If a Watercou	irse was Im	pacted, Descri	be Fully.*									
the BGT. So	il analysis r	esulted in TPF	H, BTEX a	n Taken.* Samplind chloride below en.* BGT was red ctive well area.	w standa	ırds. Analysi	s results are attac	ched.				
regulations al public health	l operators or the envir	are required to conment. The	report an acceptance	is true and compl d/or file certain rue of a C-141 repo investigate and ru	elease no	otifications are NMOCD ma	d perform correct arked as "Final R	tive act	ions for rele oes not reli	eases which eve the oper	may en	danger liability
or the enviror	nment. In a	ddition, NMO	CD accept	tance of a C-141								
federal, state,	or local lav	vs and/or regu	lations.				OH COM	ODDI	ATION	DIMICIO	N T	
Signature:	off /	eace					OIL CON	<u>SERV</u>	AHON	DIVISIO	<u>)N</u>	
Printed Name	: Jeff Peace	2			.1	Approved by	Environmental S	pecialist	:			
Title: Field E	nvironment	al Coordinator			1	Approval Dat	e:		Expiration Date:			
E-mail Addre	ss: peace.je	ffrey@bp.com	1		(Conditions of	Approval:			Attached	Attached	
Date: June 2,	2015	P	hone: 505	-326-9479								

^{*} Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004509376 TANK ID (if applicble): A & B
FIELD REPORT:	(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:	PAGE #: 1 of 1
SITE INFORMATION		DATE STARTED: 03/17/11
	30N RNG: 9W PM: NM CNTY: SJ ST: NM	DATE FINISHED: 03/18/11
1/4 -1/4/FOOTAGE: 990'N / 1,650' LEASE #: SF078201	E NW/NE LEASE TYPE: FEDERAL STATE / FEE / INDIAN ELKHORN PROD. FORMATION: MV CONTRACTOR: MBF - D, HARRIS	ENVIRONMENTAL SPECIALIST(S): NJV
REFERENCE POINT	: WELL HEAD (W.H.) GPS COORD.: 36.80119X 107.7	72788 GL ELEV.: 5,830'
95 BGT (SW/DB) - A		CE/BEARING FROM WH.: 104', S21.5W
2) 21 BCT (SW/DB) - B	GPS COORD.: 36.80138 X 107.72798 DISTANC	CE/BEARING FROM W.H.: 70', N30W
3)	GPS COORD.: DISTANC	CE/BEARING FROM W.H.:
4)		CE/BEARING FROM W.H.:
LAB INFORMATION:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL	READING (ppm)
1) SAMPLE ID: 5 PC-TB @ 6' (21		0.4/8045B/8024B/300.0 (CI) NA
2) SAMPLE ID: 5 PC-TB @ 7.5' (95		3.1/8015B/8021B/300.0 (CI) 0.0 3.1/8015B/8021B/300.0 (CI) 0.0
3) SAMPLE ID: GS - SC @ 9' (95		3.1/8015B/8021B/300.0 (CI) 0.0
4) SAMPLE ID:SOIL DESCRIPTION	SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:	
SOIL COLOR: PALE YELLOWSH ORA COHESION (ALL OTHERS): NON COHESIVE SLIGHTL CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST MOIST / W SAMPLE TYPE: GRAB COMPOSITE + DISCOLORATION/STAINING OBSERVED (medium gray), ESTIMATED < 1 CUBIC ANY AREAS DISPLAYING WETNESS: YES NO ADDITIONAL COMMENTS: SAND IN 95 WALL & 95 BGT BOTTOM (~ 4" THICK EXCAVATION DIMENSIONS (if applicable)	NGE (sand); OLIVE GRAY (silty sand) /*COHESIVE / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SET / SATURATED OF PTS. 5 YES NO EXPLANATION - ~4" THICK INTERVAL @ SOUTHERN PORTION YARD (C.Y.) EXPLANATION - SOUTH PORTION OF ANNULAR SPACE OF 95 BGT. BGT, OILTY GAND BELOW 21 BGT, MINUTE AMOUNT OF IMPACTED SOILS (C.Y.) SET / SATURATED OF PTS. 5 WA ft. X NA ft. X NA ft. Cubic yar	DESERVED WITHIN RETAINING WIMPACTED SOILS (3rd SAMPLE ID). DOWN CALIB. READ. = 52.8 ppm RF = 0.52 OWN CALIB. GAS = 100 ppm TIME: 9:50 mpm DATE: 03/18/11 MISCELL. NOTES WO - N1073331
NOTES: BGT = BELOW-GRADE TANK; E.D. = EXC T.B. = TANK BOTTOM; PBGTL = PREVIOU	WELL HEAD PARATOR COMPRESSOR (95) PBGTL T.B. ~ 5' B.G. WATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW, T.H. = TEST HOLE; ~= APPROX.; B BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; E; SW-SINGLE WALL; DW-DOUBLE WALL; SB-SINGLE BOTTOM, DB-DOUBLE BOTTOM. 03/16/11 ONSITE: 03/17/11, 03/18/1	PO - 34353 PK - ZANDECALSL (A) Permit Date: 06/08/10, 06/14/0 OCD Appr. Date: 09/29/10, 14/29/10. TANK ID A BGT Sidewalls Visible: Y/ N / NA B BOT Sidewalls Visible: Y/ N / NA Magnetic declination: 10° E

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Apr-11

CLIENT:

Blagg Engineering

Lab Order:

1103859

Project:

Florance O #20

Lab ID:

1103859-02

Client Sample ID: 5PC-TB@7.5' (95 BGT)

Collection Date: 3/18/2011 3:15:00 PM

Date Received: 3/22/2011

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF.	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE	ORGANICS				8	Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	3/28/2011 3:15:26 AM
Surr: DNOP	96.8	81.8-129		%REC	1	3/28/2011 3:15:26 AM
EPA METHOD 8015B: GASOLINE RAN	IGE					Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	3/25/2011 4:59:07 PM
Surr: BFB	99.7	89.7-125		%REC	1	3/25/2011 4:59:07 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	0.050		mg/Kg	1	3/25/2011 4:59:07 PM
Toluene	ND	0.050		mg/Kg	1	3/25/2011 4:59:07 PM
Ethylbenzene	ND	0.050		mg/Kg	1	3/25/2011 4:59:07 PM
Xylenes, Total	ND	0.050	*	mg/Kg	1	3/25/2011 4:59:07 PM
Surr: 4-Bromofluorobenzene	110	85.3-139		%REC	1	3/25/2011 4:59:07 PM
EPA METHOD 300.0: ANIONS						Analyst: SRM
Chloride	ND	7.5		mg/Kg	5	3/31/2011 1:22:38 AM
EPA METHOD 418.1: TPH						Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	Н	mg/Kg	1	4/5/2011

Qualifiers:

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

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

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Apr-11

CLIENT:

Blagg Engineering

Lab Order:

1103859

Project:

Florance O #20

Lab ID:

1103859-03

Client Sample ID: GS-SC@9' (95 BGT)

Date Received: 3/22/2011

Collection Date: 3/18/2011 9:45:00 AM

Matrix: SOIL

Analyses	Result	PQL (Qual Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGI	ORGANICS				Analyst: SCC
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	3/28/2011 3;49:17 AM
Surr: DNOP	95.1	81.8-129	%REC	1	3/28/2011 3:49:17 AM
EPA METHOD 8015B: GASOLINE RAI	NGE				Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1	3/25/2011 5:29:11 PM
Surr: BFB	101	89.7-125	%REC	1	3/25/2011 5:29:11 PM
EPA METHOD 8021B: VOLATILES					Analyst: NSB
Benzene	ND	0.050	mg/Kg	1	3/25/2011 5:29:11 PM
Toluene	ND	0.050	mg/Kg	1	3/25/2011 5:29:11 PM
Ethylbenzene	ND	0.050	mg/Kg	1	3/25/2011 5:29:11 PM
Xylenes, Total	ND	0.050	mg/Kg	1	3/25/2011 5:29:11 PM
Surr: 4-Bromofluorobenzene	112	85.3-139	%REC	1	3/25/2011 5:29:11 PM
EPA METHOD 300.0: ANIONS					Analyst: SRM
Chloride	ND	7.5	mg/Kg	5	3/31/2011 2:32:17 AM

Qualifiers:

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

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

Date: 05-Apr-11

QA/QC SUMMARY REPORT

Client:

Blagg Engineering

Project:

Florance O #20

Work Order:

1103859

Froject: Florance O	#20								Work	Order:	1103859
Analyte	Result	Units	PQL	SPK Va	a SPK ref	%Rec L	owLimit Hi	ighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 300.0: A	nions								g.		
Sample ID: MB-26158		MBLK				Batch ID:	26158	Analys	is Date:	3/29/2011	6:19:38 P
Chloride	ND	mg/Kg	1.5					,			
Sample ID: LCS-26158		LCS				Batch ID:	26158	Analys	is Date:	3/29/2011	6:37:02 P
Chloride	13.98	mg/Kg	1.5	15	0	93.2	90	110			
Method: EPA Method 418.1: Ti	PH										
Sample ID: MB-26157		MBLK				Batch ID:	26157	Analys	is Date:		3/30/201
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: MB-26236		MBLK				Batch ID:	26236	Analys	is Date:		4/5/201
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-26157	ND	LCS	20			Batch ID:	26157	Analysi	is Date:		3/30/201
	00.00		20	400	0			118	o Dato.		01001201
Petroleum Hydrocarbons, TR	96.88	mg/Kg	20	100	0	96.9 Batch ID:	81.4 26236	0. 00.100	is Date:		4/5/201
Sample ID: LCS-26236		LCS						-	is Date.		4/3/201
Petroleum Hydrocarbons, TR	104.7	mg/Kg	2 0	100	0	105	81.4	118	- D-4		2/20/004
Sample ID: LCSD-26157		LCSD				Batch ID:	26157	-	is Date:		3/30/201
Petroleum Hydrocarbons, TR	95.50	mg/Kg	20	100	0	95.5	81.4	118	1.43	8.58	
Sample ID: LCSD-26236		LCSD				Batch ID:	26236	Analysi	is Date:		4/5/201
Petroleum Hydrocarbons, TR	103.3	mg/Kg	20	100	0	103	81.4	118	1.33	8.58	
Method: EPA Method 8015B: D	iesel Range	Organics									
Sample ID: MB-26098		MBLK				Batch ID:	26098	Analysi	is Date:	3/25/2011	9:44:45 Al
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-26098		LCS				Batch ID:	26098	Analysi	is Date:	3/25/2011 1	0:19:07 A
Diesel Range Organics (DRO)	49.83	mg/Kg	10	50	0	99.7	66.2	120		×	
Sample ID: LCSD-26098	10.00	LCSD				Batch ID:	26098	Analysi	s Date:	3/25/2011 1	0:53:14 Al
Diesel Range Organics (DRO)	51.17	mg/Kg	10	50	0	102	66.2	120	2.66	14.3	
	• • • • • • • • • • • • • • • • •					102	00.2	120			
Method: EPA Method 6015B: G	iasoline Ran	_				Detak ID.	00405	Anabia	a Data:	2/25/2014	7.E0.47 DI
Sample ID: MBLK-26105		MBLK	Openio Miles			Batch ID:	26105	Analysi	s Date:	3/25/2011	7.59.47 P
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0			B (1 1B			D /	010510011	
Sample ID: LCS-26105		LCS				Batch ID:	26105	Analysi	s Date:	3/25/2011	5:59:35 PI
Gasoline Range Organics (GRO)	25.02	mg/Kg	5.0	25	0	100	88.8	124			
Method: EPA Method 6021B: V	olatiles										
Sample ID: MBLK-26105		MBLK				Batch ID:	26105	Analysi	s Date:	3/25/2011	7:59:47 PI
Benzene	ND	mg/Kg	0.050								
oluene	ND	mg/Kg	0.050								
thylbenzene	ND	mg/Kg	0.050								
ylenes, Total	ND	mg/Kg	0.10								
ample ID: LCS-26105		LCS				Batch ID:	26105	Analysi	s Date:	3/25/2011	7:29:38 P
Benzene	1.057	mg/Kg	0.050	1	0.0171	104	83.3	107			
oluene	0.9806	mg/Kg	0.050	1	0	98.1	74.3	115			
Ethylbenzene	1.036	mg/Kg	0.050	1	0.0055	103	80.9	122			
								123			

Qualifiers:

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name BLAGG				Date Receive	ed:	3/22/2011	
Work Order Number 1103859	and the same of th			Received b	y: KMS	h . A	
Checklist completed by: Signature	A		3/5	3 /11	abels checked by	Initials	·
Matrix:	Carrier name:	Gre	yhound	,			
Objective and involved a large and and the O				No 🗆	N. (B	٦	
Shipping container/cooler in good condition?		Yes			Not Present	_	
Custody seals intact on shipping container/coo	ler?	Yes		No 🗆	Not Present		
Custody seals intact on sample bottles?		Yes		No 🗆	N/A	4	
Chain of custody present?		Yes		No 🗌			
Chain of custody signed when relinquished and	d received?	Yes		No 🗆			
Chain of custody agrees with sample labels?		Yes		No 🗆			
Samples in proper container/bottle?		Yes	V	No 🗆			
Sample containers intact?		Yes	/	No 🗌	•		
Sufficient sample volume for indicated test?		Yes		No 🗆			
All samples received within holding time?		Yes	/	No 🗆		Number of bottles che	f preserved ecked for
Water - VOA vials have zero headspace?	No VOA vials subn	nitted	Y	Yes	No 🗌	pH:	
Water - Preservation labels on bottle and cap n	natch?	Yes		No 🗌	N/A 🗹	***	
Water - pH acceptable upon receipt?		Yes		No 🗌	N/A 🗹	<2 >12 unle below.	ess noted
Container/Temp Blank temperature?		4.	0°	<6° C Acceptab			
COMMENTS:				ii giveii sunicieiii	time to cool.		
						¥	
Client contacted	Date contacted:			Pers	on contacted		
Contacted by:	Regarding:				×		
Comments:							
			-	1150000			
						The same of the sa	
				*			

Corrective Action							***
Corrective Action							

Chain-of-Custody Record			Turn-Around Time:				HALL ENVIRONMENTAL																
Client:	Client: BLAGG ENGR. / BP AMERICA Standard Rush					ANALYSIS LABORATORY																	
			1		Project Name	:			1		-1	v	ww	.hall	envi	ironn	nenta	al.co	m				
Mailing Address: P.O. BOX 87			87	FLORANCE O #20				www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109															
BLFD. NM 87413			Project #:							5-34						345-							
Phone #: (565) 632-1199										9		Aı	naly	sis l	Requ	uest					M.		
email or Fax#:			Project Manager:				8	only)	(leg					,SO ₄)							1		
QA/QC Package: Standard Level 4 (Full Validation)				NEWSON VELEZ				3 (8021₺	(Gas or	(Gas/Diesel)					PO₄,SC	PCB's			0.0)		1	ABB RI	
Accredit					Sampler: /	ELJON	VELEZ		4	PH (02,	082	94-94		300		4	出一
□ NELAP □ Other			On ice	ta/fes	adVo		Ŧ	+	15B	418.1)	94.	AH)3,h	8/8		F	7		9	S Z		
□ EDD (Type)			Sample Tem	resalute 4			出出	BE	d 80	9d 4	3d 5	or F	tals	N,	ides	8	9	8		SAMPLE	Composite es (Y or N)		
Date	Time	Matrix	San	mple Request ID		Preservative Type		0.300° /=	BTEX + MTBE	BTEX + MTBE	TPH Method 801	TPH (Method	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,CI,NO3,NO2,PO4,	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	CHLORIDE		GRANB S	S polar Compost
2/ /	1515	SOIL	SPC-	1886 (LIBET)	902 -	COOL	1		1		V	V							-	V	\neg		1
1.11.1	10.0																						
3/18/11	6915	Soil	5PC-	TBe7.5' (95 Bet)	4021	COOL	2		1		V	V								√			-/
3/18/11	0945	SOIL	E2-	SCE9' (95 BET)	4021	CooL	3		V		√									1		1	
								6-															
													-										
		1					,		-	_	_					_							
										<u></u>						<u> </u>							
Date:	Time: 1505	Relinquist	ln	VJ	Received by:	- Walt	an 3/21/11	ime /505 ime	Re	mark	u						•			33: 5L			
3/21/11	1627	M	estire	- Walles	Jah 3/22/ji 16:23					PAYREY: ZANDECALSL 23 TPH (8015) - GRO & DRO ONLY													
4	If necessary	, samples su	bmitted to I	Hall Environmental may be sub-	contracted to other a	ccredited laboratori	ies. This serves as r	notice of th	nis poss	ibility.	Any s	ub-con	tracte	d data	will b	e clea	rly not	ated or	n the a	inalytic	al rep	ort.	



