

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

15865

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: GALLEGOS CANYON UNIT 135
API Number: 3004507885 OCD Permit Number: _____
U/L or Qtr/Qtr F Section 26.0 Township 29.0N Range 13W County: San Juan County
Center of Proposed Design: Latitude 36.70082 Longitude -108.17709 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 _____
OIL CONS. DIV DIST. 3
FEB 16 2017

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 Tank ID: B
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 SINGLE WALLED DOUBLE BOTTOMED SIDEWALLS NOT VISIBLE
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 Bureau office for consideration of approval.

20

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. - 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). - 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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <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. - 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. - 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. - 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. - 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. - 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. - 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 H₂S, 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 indentify 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.
 - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes No
 NA
- Ground water is between 50 and 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
- 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 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.
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image Yes 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.
 - NM Office of the State Engineer - iWATERS database; 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

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): _____ Title: _____
 Signature: _____ Date: _____
 e-mail address: _____ Telephone: _____

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

OCD Representative Signature: [Signature] Approval Date: 2/23/2017
 Title: Environmental Specialist OCD Permit Number: _____

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: 12/19/2016

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 indentify 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 36.70082 Longitude -108.17709 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): Steve Moskal Title: Field Environmental Coordinator
 Signature: [Signature] Date: 02/16/2017
 e-mail address: steven.moskal@bp.com Telephone: 505-326-9497

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit # 135 – Tank ID: B
API #: 3004507885
Unit Letter F, Section 26, T29N, R13W

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 was provided and documented in the attached email.
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/or sludge within 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 for recycling.

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 (mg/Kg)	Sample Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.023
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.092
TPH	US EPA Method SW-846 418.1	100	13
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<30

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 beneath the BGT was sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are 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 reveal no evidence of a release has 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.

Sampling results reveal no evidence of a release has occurred. Area was backfilled with clean, earthen material and is within the active well pad.

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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.

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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.
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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.
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.
The BGT area has been backfilled and will be reclaimed once the well has been plugged & 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 successfully completed.
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 & contains a photo of the reclamation completion.**
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
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

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 America Production Company	Contact Steve Moskal
Address 200 Energy Court, Farmington, NM 87401	Telephone No. (505) 326-9497
Facility Name GALLEGOS CANYON UNIT 135	Facility Type Natural Gas Well
Surface Owner Federal	Mineral Owner Federal
API No. 3004507885	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	26	29N	13W	1,545	NORTH	2,070	WEST	SAN JUAN

Latitude 36.70082 Longitude -108.17709

NATURE OF RELEASE

Type of Release NONE – BGT CONFIRMATION SAMPLING	Volume of Release N/A	Volume Recovered N/A
Source of Release NOT APPLICABLE (N/A)	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
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.* **NO INDICATION OF ANY INTEGRITY &/OR MAINTENANCE PROBLEMS WITH THE BGT, THEREFORE NO REMEDIAL ACTION NECESSARY. SAMPLING BENEATH BGT WAS CONDUCTED IMMEDIATELY AFTER REMOVAL. FIELD & LABORATORY ANALYTICAL REPORTS ARE ATTACHED.**

Describe Area Affected and Cleanup Action Taken.* **NO CLEANUP ACTION NECESSARY. FINAL LABORATORY RESULTS SUPPORT CLOSURE OF THE BGT LOCATION.**

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: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Steve Moskal	Approved by Environmental Specialist:		
Title: Environmental Field Coordinator	Approval Date:	Expiration Date:	
E-mail Address: steven.moskal@bp.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: December 19, 2016	Phone: (505) 326-9497		

* Attach Additional Sheets If Necessary

BP Pit Close Notification - GALLEGOS CANYON UNIT 135

12/08/16 at 11:39 AM

From: Railsback, Farrah (CH2M HILL) <Farrah.Railsback@bp.com>

To: Smith, Cory, EMNRD, Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)

CC: jeffcblagg@aol.com, blagg_njv@yahoo.com, Moskal, Steven

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

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US; VANESSA.FIELDS@STATE.NM.US

December 8, 2016

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

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

GALLEGOS CANYON UNIT 135
API 30-045-07885
(F) Section 26 – T29N – R13W
San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 21bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around December 13, 2016.

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

Sincerely,

Steven Moskal
BP Field Environmental Coordinator

(505) 326-9497

Farrah Railsback

BGT Project Support
970-946-9199 -cell

This email and any attachments are intended only for the addressee(s) listed above and may contain confidential, proprietary, and/or privileged information. If you are not an intended recipient, please immediately advise the sender by return email, delete this email and any attachments, and destroy any copies of same. Any unauthorized review, use, copying disclosure or distribution of this email and any attachments is prohibited.



BP America Production Company
200 Energy Court
Farmington, NM 87401

December 8, 2016

Bureau of Land Management
Whitney Thomas
6251 College Suite A
Farmington, NM 87402

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank
Well Name: GALLEGOS CANYON UNIT 135
API #: 3004507885

Dear Mrs. Thomas,

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 December 13, 2016. 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.

If witnessing of the tank removal is required please contact me for a specific time (505)-326-9497.

Sincerely,

Steven Moskal

BP America Production Company

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004507885 TANK ID (if applicable): B
-------------------	---	---

FIELD REPORT: (circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER: _____

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

SITE INFORMATION:	SITE NAME: GCU # 135	DATE STARTED: 12/13/16
QUAD/UNIT: F SEC: 26 TWP: 29N RNG: 13W PM: NM CNTY: SJ ST: NM		DATE FINISHED: _____
1/4 -1/4/FOOTAGE: 1,545'N / 2,070'W SE/NW LEASE TYPE: <input checked="" type="checkbox"/> FEDERAL / STATE / FEE / INDIAN		ENVIRONMENTAL SPECIALIST(S): NJV
LEASE #: SF078926A PROD. FORMATION: DK CONTRACTOR: BP - A. SALAZAR		

REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.: 36.70046 X 108.17743	GL ELEV.: 5,728'
1) 21 BGT (SW/DB)	GPS COORD.: 36.70082 X 108.17709	DISTANCE/BEARING FROM WH.: 167', N40.5E
2) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____
3) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____
4) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____

SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL	OVM READING (ppm)
1) SAMPLE ID: 5PC - TB @ 6' (21)	SAMPLE DATE: 12/13/16 SAMPLE TIME: 1115 LAB ANALYSIS: 8015B/8021B/300.0 (CI)	NA
2) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	
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 _____	
SOIL COLOR: DARK YELLOWISH ORANGE	PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC	
COHESION (ALL OTHERS): <input checked="" type="checkbox"/> NON COHESIVE / <input type="checkbox"/> SLIGHTLY COHESIVE / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> HIGHLY COHESIVE	DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD	
CONSISTENCY (NON COHESIVE SOILS): <input type="checkbox"/> LOOSE / <input checked="" type="checkbox"/> FIRM / <input type="checkbox"/> DENSE / <input type="checkbox"/> VERY DENSE	HC ODOR DETECTED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	
MOISTURE: DRY / <input checked="" type="checkbox"/> SLIGHTLY MOIST / <input type="checkbox"/> MOIST / <input type="checkbox"/> WET / <input type="checkbox"/> SATURATED / <input type="checkbox"/> SUPER SATURATED	ANY AREAS DISPLAYING WETNESS: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	
SAMPLE TYPE: GRAB / <input checked="" type="checkbox"/> COMPOSITE / # OF PTS. 5	DISCOLORATION/STAINING OBSERVED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	

SITE OBSERVATIONS:	LOST INTEGRITY OF EQUIPMENT: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____	
APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION: _____		
EQUIPMENT SET OVER RECLAIMED AREA: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLANATION - _____		
OTHER: NMOC D OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING.		

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'** NMOC D TPH CLOSURE STD: **1,000** ppm

<p>SITE SKETCH</p> <p style="text-align: center;">BGT Located : off / <input checked="" type="checkbox"/> on site PLOT PLAN circle: attached</p>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>OVM CALIB. READ. = NA ppm</td> <td>RF = 0.52</td> </tr> <tr> <td>OVM CALIB. GAS = NA ppm</td> <td></td> </tr> <tr> <td>TIME: NA am/pm</td> <td>DATE: NA</td> </tr> </table> <p>MISCELL. NOTES</p> <p>WO: _____</p> <p>REF. #: P - 755</p> <p>VID: VHIXONEVB2</p> <p>PJ #: _____</p> <p>Permit date(s): 06/14/10</p> <p>OCD Appr. date(s): 11/02/16</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">Tank ID</td> <td style="width:90%;">OVM = Organic Vapor Meter ppm = parts per million</td> </tr> <tr> <td>B</td> <td>BGT Sidewalls Visible: Y / (N)</td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: Y / N</td> </tr> </table> <p>Magnetic declination: 10° E</p>	OVM CALIB. READ. = NA ppm	RF = 0.52	OVM CALIB. GAS = NA ppm		TIME: NA am/pm	DATE: NA	Tank ID	OVM = Organic Vapor Meter ppm = parts per million	B	BGT Sidewalls Visible: Y / (N)		BGT Sidewalls Visible: Y / N		BGT Sidewalls Visible: Y / N
OVM CALIB. READ. = NA ppm	RF = 0.52														
OVM CALIB. GAS = NA ppm															
TIME: NA am/pm	DATE: NA														
Tank ID	OVM = Organic Vapor Meter ppm = parts per million														
B	BGT Sidewalls Visible: Y / (N)														
	BGT Sidewalls Visible: Y / N														
	BGT Sidewalls Visible: Y / N														

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.

NOTES: **GOOGLE EARTH IMAGERY DATE: 2016 GOOGLE.** ONSITE: **12/13/16**

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1612740

Date Reported: 12/15/2016

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB @ 6' (21)

Project: GCU #135

Collection Date: 12/13/2016 11:15:00 AM

Lab ID: 1612740-001

Matrix: SOIL

Received Date: 12/14/2016 8:05:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: LGT
Chloride	ND	30		mg/Kg	20	12/14/2016 12:01:12 PM	29183
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	13	10		mg/Kg	1	12/14/2016 10:25:59 AM	29175
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	12/14/2016 10:25:59 AM	29175
Surr: DNOP	81.0	70-130		%Rec	1	12/14/2016 10:25:59 AM	29175
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.6		mg/Kg	1	12/14/2016 10:23:36 AM	G39381
Surr: BFB	88.9	68.3-144		%Rec	1	12/14/2016 10:23:36 AM	G39381
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.023		mg/Kg	1	12/14/2016 10:23:36 AM	B39381
Toluene	ND	0.046		mg/Kg	1	12/14/2016 10:23:36 AM	B39381
Ethylbenzene	ND	0.046		mg/Kg	1	12/14/2016 10:23:36 AM	B39381
Xylenes, Total	ND	0.092		mg/Kg	1	12/14/2016 10:23:36 AM	B39381
Surr: 4-Bromofluorobenzene	100	80-120		%Rec	1	12/14/2016 10:23:36 AM	B39381

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

Qualifiers:		
*	Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	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	P Sample pH Not In Range
R	RPD outside accepted recovery limits	RL Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612740

15-Dec-16

Client: Blagg Engineering

Project: GCU #135

Sample ID	MB-29183	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	29183	RunNo:	39400					
Prep Date:	12/14/2016	Analysis Date:	12/14/2016	SeqNo:	1233612	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-29183	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	29183	RunNo:	39400					
Prep Date:	12/14/2016	Analysis Date:	12/14/2016	SeqNo:	1233613	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	96.3	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: 1612740
 15-Dec-16

Client: Blagg Engineering
Project: GCU #135

Sample ID	LCS-29175	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	29175	RunNo:	39372					
Prep Date:	12/14/2016	Analysis Date:	12/14/2016	SeqNo:	1232663	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	10	50.00	0	89.4	63.8	116			
Surr: DNOP	4.2		5.000		83.2	70	130			

Sample ID	MB-29175	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	29175	RunNo:	39372					
Prep Date:	12/14/2016	Analysis Date:	12/14/2016	SeqNo:	1232664	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	8.3		10.00		83.1	70	130			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: 1612740

15-Dec-16

Client: Blagg Engineering

Project: GCU #135

Sample ID RB	SampType: MBLK		TestCode: EPA Method 8015D: Gasoline Range							
Client ID: PBS	Batch ID: G39381		RunNo: 39381							
Prep Date:	Analysis Date: 12/14/2016		SeqNo: 1233413		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	860		1000		85.7	68.3	144			

Sample ID 2.5UG GRO LCS	SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range							
Client ID: LCSS	Batch ID: G39381		RunNo: 39381							
Prep Date:	Analysis Date: 12/14/2016		SeqNo: 1233414		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	27	5.0	25.00	0	108	74.6	123			
Surr: BFB	940		1000		93.7	68.3	144			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612740

15-Dec-16

Client: Blagg Engineering

Project: GCU #135

Sample ID RB	SampType: MBLK		TestCode: EPA Method 8021B: Volatiles							
Client ID: PBS	Batch ID: B39381		RunNo: 39381							
Prep Date:	Analysis Date: 12/14/2016		SeqNo: 1233459		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.95		1.000		94.8	80	120			

Sample ID 100NG BTEX LCS	SampType: LCS		TestCode: EPA Method 8021B: Volatiles							
Client ID: LCSS	Batch ID: B39381		RunNo: 39381							
Prep Date:	Analysis Date: 12/14/2016		SeqNo: 1233460		Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.0	0.025	1.000	0	101	75.2	115			
Toluene	0.92	0.050	1.000	0	92.0	80.7	112			
Ethylbenzene	0.92	0.050	1.000	0	92.0	78.9	117			
Xylenes, Total	2.8	0.10	3.000	0	91.7	79.2	115			
Surr: 4-Bromofluorobenzene	0.95		1.000		95.5	80	120			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified



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: **1612740**

RcptNo: **1**

Received by/date: AT 12/14/16

Logged By: **Anne Thorne** 12/14/2016 8:05:00 AM *Anne Thorne*

Completed By: **Anne Thorne** 12/14/2016 8:37:07 AM *Anne Thorne*

Reviewed By: *AG* 12/14/16

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
12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes No
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

of preserved bottles checked for pH: _____
 (<2 or >12 unless noted)

Adjusted? _____

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			

Chain-of-Custody Record

Turn-Around Time: **SAME DAY**

Standard Rush



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**

Mail or Fax#:

A/QC Package:
 Standard Level 4 (Full Validation)

Accreditation:
 NELAP Other

Method (Type)

Project Name: **GCU # 135**

Project #:

Project Manager: **NELSON VELEZ**

Sampler: **NELSON VELEZ**

On Ice: Yes No

Sample Temperature: **1.6**

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX + MTBE + TPMS (8021B)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water - 300.1)	Grab sample	5 pt. composite sample	Air Bubbles (Y or N)
12/13/16	1115	SOIL	SPC - TB @ 6' (21)	AT 1211419 meat ket	Cool	162740	✓		✓									✓		✓	

Date: 12/13/16 Time: 1800 Relinquished by: *[Signature]*

Date: 12/13/16 Time: 1803 Received by: *[Signature]*

Date: 12/14/16 Time: 0805 Relinquished by: *[Signature]*

Date: 12/14/16 Time: 0805 Received by: *[Signature]*

Remarks: **BILL DIRECTLY TO BP USING THE CONTACT WITH CORRESPONDING VID & REFERENCE # WHEN APPLICABLE;**

CONTACT: **STEVE MOSKAL / VANCE HIXON**

VID: **VHIXONEVB2**

Reference # **P - 755**

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 notated on the analytical report.

505-947-9900

BP AMERICA PRODUCTION COMPANY

GALLEGOS CANYON UNIT 135

API 3004507885 LEASE NMMN 745301

1545 FNL 2070 FWL (F) SEC 26 T2M R1E

San Juan County ELEV 5725'

LAT 36° 42' 1.584"

LONG 108° 10' 38.784"



Previous 21 bbl BGT
Position (Tank ID: B)

B