

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	Contact: Steve Moskal	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497	
Facility Name: Tapp LS 003 A	Facility Type: Natural gas well	
Surface Owner: Federal	Mineral Owner: Federal	API No. 300452369500

LOCATION OF RELEASE

Unit Letter I	Section 15	Township 28N	Range 08W	Feet from the 1,620	North/South Line South	Feet from the 820	East/West Line East	County: San Juan
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Latitude 36.65831° Longitude -107.66217°

NATURE OF RELEASE

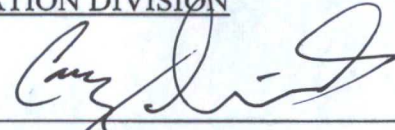
Type of Release: Unknown - hydrocarbon	Volume of Release: unknown	Volume Recovered: none
Source of Release: Unknown - suspect earthen pit; 95 bbl BGT	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: November 30, 2017
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* During the closure of a below grade tank sampling indicated what appears to be hydrocarbon impacts to the soil, likely associated with an earthen pit.

Describe Area Affected and Cleanup Action Taken.* BP proposes to employ soil shredding to remediate hydrocarbon impacted soils at the location. The areas of concern will be excavated, treated and backfilled according to the attached remediation plan, pending approval.

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: 	OIL CONSERVATION DIVISION	
Printed Name: John Ritchie	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: <u>1/2/18</u>	Expiration Date:
E-mail Address: john.ritchie@bp.com	Conditions of Approval:	Attached ☒
Date: December 19, 2017	Phone: 505-320-7703	

* Attach Additional Sheets If Necessary

#NCS 1800255653

54

Untitled Map

Write a description for your map.

Legend

TAPP LS 003 A (API: 300452369500)

Disturbed Well Pad Perimeter

Chemical and
Process Control
Trailer Staging Area

95 BGT Impact
Source Area

TREATED SOIL
TEMPORARY STORAGE

TAPP LS 003 A (API: 300452369500)

TREATED SOIL
TEMPORARY STORAGE



BP Remediation Plan

To: Cory Smith, Vanessa Fields(NMOCD), Whitney Thomas (BLM)
From: John Ritchie (BP)
CC: Jeff Blagg (Blagg Engineering)
Date: 12/19/2017
Re: Tapp LS 3A - Ex-situ Soil Remediation – Soil Shredding
(I) S-15, T28N, R08W; API #30-045-23695

Dear Mr. Smith, Mrs. Fields and Mrs. Thomas,

The Tapp LS 3A site is an active natural gas production well location within the San Juan Basin Gas Field in San Juan County, New Mexico. The site is located on land managed by the Bureau of Land Management Farmington Field Office (BLM-FFO) and is in an area primarily used for oil and gas production and recreation.

Background

Historical impacts were identified at the location on November 30, 2017 during the closure of a 95 bbl below grade tank (BGT). The impacts are likely the result of earthen pits formerly used on the location. No historical documentation is available regarding this pit. Initial site investigation determined additional delineation was required to define the extents of impacts. Delineation of the site has not yet been performed. The well site is operated by BP Production.

Site Ranking

Following the NMOCD site ranking criteria, the site closure standard is 5,000 ppm TPH, 50 ppm BTEX and 10 ppm benzene:

- Depth to groundwater >100' (0 points)
- Nearest surface water source >1,000' (0 points)
- Distance to nearest water wells >1,000' (0 points)

Proposed Remediation – Soil Shredding

Based on recent success of soil shredding technologies performed on BP remediation sites, BP proposes to use this technology at the subject site. To date, BP has successfully contracted soil shredding of over 50,000 cubic yards of soil to meet site closure standards.

Soil shredding involves the excavation of the impacted soil which is then placed in processing equipment, such as a hammer mill or pug mill, to mechanically process and break-up the soil. The soil becomes more uniform and is aerated during the mechanical processing. The soil is then ejected from the processing equipment and a chemical oxidizer is applied, in this case, a 35% solution of hydrogen peroxide and water. The applied concentration of hydrogen peroxide typically ranges from 3-8%. The hydrogen peroxide quickly oxidizes the hydrocarbon impacts (reagents), resulting in soil, water and carbon dioxide (products). Once the soil is processed, it is stockpiled and allowed to sit for approximately 2-5 days of residence time. A composite soil sample is collected from each segregated stockpile and submitted for laboratory analysis to determine the effectiveness of the ex-situ remediation process. If the laboratory results are of acceptable levels, the soil will be used as backfill to the excavation; if results are unsatisfactory, the soil is passed through the process once more and a subsequent laboratory sample will be collected for laboratory confirmation as described before.

Typically, 24 hours of notice is provided to the regulatory agencies for the opportunity to observe and witness the stockpile sampling.

BP proposes to perform the remediation of hydrocarbon impacts by the means of soil shredding. A conservative estimate of approximately 750 cubic yards of soil will be treated through the soil shredding process. BP proposes to treat the impacted soil and segregate windrow stockpiles broken into 100 cubic yard increments. A single, five point composite, soil sample will be collected to represent each 100 cubic yard stockpile. Once a baseline of approximately 1,000 cubic yards of soil is consistently and successfully treated, BP will propose to decrease the sampling frequency to 500 cubic yard stockpile segments. The 500 cubic yard sampling modification will be discussed with the NMOCD and BLM for approval and input prior to implementation. BP would expect to have a sampling modification approval from the agencies within 48 working hours from the time of request. The remediation will then continue until complete and sampling will be based on the regulatory agencies approved sampling plan.

Excavation sampling will be in accordance with a typical dig and haul. The sidewalls and base of the excavation will be sampled in a frequency based on the size and progress of the excavation. Agency notification of excavation sampling will also be issued in advanced, 24-48 hours if possible.

It is understood, that if soil remediation is not successful via the soil shredding, an alternative method such as a dig and haul or soil vapor extraction will be necessary. BP will be in close communications with the agencies in the event an alternative remediation method is required.

Site Closure and Reporting

Once the soil shredding process is complete, the excavated area will be fully backfilled and compacted, and surface equipment will be re-set. Any necessary interim reclamation will be performed. Final reclamation of the well pad will occur at a later date, once the natural gas production well is plugged and abandoned.

A final remediation report will be delivered to NMOCD and BLM for approval of final site closure regarding the excavation and soil shredding activities within 60 days of the end of remediation.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0137
Expires: July 31, 2010

SUNDRY NOTICES AND REPORTS ON WELLS
***Do not use this form for proposals to drill or to re-enter an
abandoned well. Use Form 3160-3 (APD) for such proposals.***

5. Lease Serial No.
SF078040

6. If Indian, Allottee or Tribe Name

SUBMIT IN TRIPLICATE – Other instructions on page 2.

7. If Unit of CA/Agreement, Name and/or No.

1. Type of Well

☐ Oil Well ☒ Gas Well ☐ Other

8. Well Name and No.
TAPP LS 003A

2. Name of Operator
BP America Production Company

9. API Well No.
300452369500

3a. Address
200 Energy Ct, Farmington NM, 87401

3b. Phone No. (include area code)
505-320-7703

10. Field and Pool or Exploratory Area
Blanco Mesa Verde

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)
1,620 FSL, 820 FEL, S15, T28N, R08W

11. Country or Parish, State
San Juan County, NM

12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
☒ Notice of Intent	☐ Acidize	☐ Deepen	☐ Production (Start/Resume)	☐ Water Shut-Off
☐ Subsequent Report	☐ Alter Casing	☐ Fracture Treat	☐ Reclamation	☐ Well Integrity
☐ Final Abandonment Notice	☐ Casing Repair	☐ New Construction	☐ Recomplete	☒ Other Remediation of Im-
	☐ Change Plans	☐ Plug and Abandon	☐ Temporarily Abandon	pacted soil by Soil-
	☐ Convert to Injection	☐ Plug Back	☐ Water Disposal	Shredding

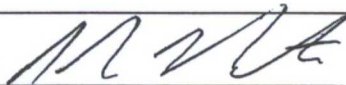
13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleat horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompleat in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has determined that the site is ready for final inspection.)

BP proposes to excavate impacted soils observed during BGT closure on November 30, 2017. Impacted soils will be remediated via Soil-Shredding. All excavation and soil shredding will occur within original drilling pad foot-print. Once treated via soil-shredding the soils will be sampled and laboratory analyzed for total petroleum hydrocarbons, benzene, toluene, ethylbenzene and xylenes. A remediation workplan providing greater detail is attached. BP currently estimates 1 week to complete this process.

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed)
John Ritchie

Title Field Environmental Coordinator

Signature



Date 12/19/2017

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved by

Title

Date

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13 - Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment.

NOTICES

The Privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c) and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

December 05, 2017

Nelson Velez

Blagg Engineering

P. O. Box 87

Bloomfield, NM 87413

TEL: (505) 632-1199

FAX (505) 632-3903

RE: TAPP LS 3A

OrderNo.: 1712004

Dear Nelson Velez:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/1/2017 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1712004

Date Reported: 12/5/2017

CLIENT: Blagg Engineering

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

Project: TAPP LS 3A

Collection Date: 11/30/2017 11:45:00 AM

Lab ID: 1712004-001

Matrix: SOIL

Received Date: 12/1/2017 7:08:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	52	30		mg/Kg	20	12/1/2017 12:00:58 PM	35263
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	23	9.3		mg/Kg	1	12/1/2017 10:17:01 AM	35260
Motor Oil Range Organics (MRO)	52	46		mg/Kg	1	12/1/2017 10:17:01 AM	35260
Surr: DNOP	102	70-130		%Rec	1	12/1/2017 10:17:01 AM	35260
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.5		mg/Kg	1	12/1/2017 12:55:13 PM	G47476
Surr: BFB	91.4	15-316		%Rec	1	12/1/2017 12:55:13 PM	G47476
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.023		mg/Kg	1	12/1/2017 12:55:13 PM	B47476
Toluene	ND	0.045		mg/Kg	1	12/1/2017 12:55:13 PM	B47476
Ethylbenzene	ND	0.045		mg/Kg	1	12/1/2017 12:55:13 PM	B47476
Xylenes, Total	ND	0.091		mg/Kg	1	12/1/2017 12:55:13 PM	B47476
Surr: 4-Bromofluorobenzene	88.1	80-120		%Rec	1	12/1/2017 12:55:13 PM	B47476

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
	PQL	Practical Quantitative Limit	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#: 1712004

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	MB-35263		SampType: mblk		TestCode: EPA Method 300.0: Anions					
Client ID:	PBS		Batch ID: 35263		RunNo: 47471					
Prep Date:	12/1/2017		Analysis Date: 12/1/2017		SeqNo: 1516483		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-35263		SampType: lcs		TestCode: EPA Method 300.0: Anions					
Client ID:	LCSS		Batch ID: 35263		RunNo: 47471					
Prep Date:	12/1/2017		Analysis Date: 12/1/2017		SeqNo: 1516484		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.7	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
PQL Practical Quantitative Limit
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#: 1712004

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	LCS-35260		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 35260		RunNo: 47457					
Prep Date:	12/1/2017		Analysis Date: 12/1/2017		SeqNo: 1515167		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	89.8	73.2	114			
Surr: DNOP	3.8		5.000		75.8	70	130			

Sample ID	MB-35260	SampType:	MBLK		TestCode:	EPA Method 8015M/D: Diesel Range Organics				
Client ID:	PBS	Batch ID:	35260		RunNo:	47457				
Prep Date:	12/1/2017	Analysis Date:	12/1/2017		SeqNo:	1515168	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	8.4		10.00		83.7	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
PQL Practical Quantitative Limit
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#: 1712004

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	RB	SampType: MBLK			TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID: G47476			RunNo: 47476					
Prep Date:		Analysis Date: 12/1/2017			SeqNo: 1516064		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	880		1000		88.5	15	316			

Sample ID	2.5UG GRO LCS	SampType: LCS			TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID: G47476			RunNo: 47476					
Prep Date:		Analysis Date: 12/1/2017			SeqNo: 1516065		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	99.8	75.9	131			
Surr: BFB	1000		1000		104	15	316			

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
PQL Practical Quantitative Limit	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#: 1712004

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	RB	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	B47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516095	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	0.85		1.000		84.6	80	120			

Sample ID	100NG BTEX LCS	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	B47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516096	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.025	1.000	0	92.6	77.3	128			
Toluene	0.93	0.050	1.000	0	92.7	79.2	125			
Ethylbenzene	0.92	0.050	1.000	0	92.3	80.7	127			
Xylenes, Total	2.8	0.10	3.000	0	94.1	81.6	129			
Surr: 4-Bromofluorobenzene	0.87		1.000		86.6	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
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank
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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: 1712004

RcptNo: 1

Received By: Sophia Campuzano 12/1/2017 7:08:00 AM

Completed By: Anne Thorne 12/1/2017 7:58:58 AM

Reviewed By: DDS 12/01/17

Sophia Campuzano

Anne Thorne

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 $>0^{\circ}\text{C}$ 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	2.1	Good	Yes			

Chain-of-Custody Record		Turn-Around Time: SAME DAY	
Client: BLAGG ENGR. / BP AMERICA		☐ Standard ☒ Rush	
Mailing Address: P.O. BOX 87		Project Name: TAPP LS # 3A	
BLOOMFIELD, NM 87413		Project #: _____	
Phone #: (505) 632-1199		Project Manager: NELSON VELEZ	
email or Fax#: _____		Sampler: NELSON VELEZ	
QA/QC Package: ☒ Standard ☐ Level 4 (Full Validation)		On Ice: ☒ Yes ☐ No	
Accreditation: ☐ NELAP ☐ Other _____		Sample Temperature: 3.9 - 1.8 (cr) - 2.1	
☐ EDD (Type) _____		_____	

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

[illegible]

Reference # P - 881

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.



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

December 05, 2017

Nelson Velez
Blagg Engineering
P. O. Box 87
Bloomfield, NM 87413
TEL: (505) 632-1199
FAX (505) 632-3903

RE: TAPP LS 3A

OrderNo.: 1712001

Dear Nelson Velez:

Hall Environmental Analysis Laboratory received 4 sample(s) on 12/1/2017 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1712001

Date Reported: 12/5/2017

CLIENT: Blagg Engineering

Client Sample ID: 1 @ 8.5' (95)

Project: TAPP LS 3A

Collection Date: 11/30/2017 11:53:00 AM

Lab ID: 1712001-001

Matrix: SOIL

Received Date: 12/1/2017 7:08:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	ND	30		mg/Kg	20	12/1/2017 10:58:55 AM	35263
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	6300	97		mg/Kg	10	12/1/2017 10:24:46 AM	35260
Motor Oil Range Organics (MRO)	1200	480		mg/Kg	10	12/1/2017 10:24:46 AM	35260
Surr: DNOP	0	70-130	S	%Rec	10	12/1/2017 10:24:46 AM	35260
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	580	23		mg/Kg	5	12/1/2017 9:47:25 AM	G47476
Surr: BFB	721	15-316	S	%Rec	5	12/1/2017 9:47:25 AM	G47476
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.12		mg/Kg	5	12/1/2017 9:47:25 AM	B47476
Toluene	0.42	0.23		mg/Kg	5	12/1/2017 9:47:25 AM	B47476
Ethylbenzene	2.9	0.23		mg/Kg	5	12/1/2017 9:47:25 AM	B47476
Xylenes, Total	31	0.46		mg/Kg	5	12/1/2017 9:47:25 AM	B47476
Surr: 4-Bromofluorobenzene	111	80-120		%Rec	5	12/1/2017 9:47:25 AM	B47476

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
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1712001

Date Reported: 12/5/2017

CLIENT: Blagg Engineering

Client Sample ID: 1 @ 13' (95)

Project: TAPP LS 3A

Collection Date: 11/30/2017 12:20:00 PM

Lab ID: 1712001-002

Matrix: SOIL

Received Date: 12/1/2017 7:08:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	95	30		mg/Kg	20	12/1/2017 11:11:20 AM	35263
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	7100	97		mg/Kg	10	12/1/2017 12:15:48 PM	35260
Motor Oil Range Organics (MRO)	1800	490		mg/Kg	10	12/1/2017 12:15:48 PM	35260
Surr: DNOP	0	70-130	S	%Rec	10	12/1/2017 12:15:48 PM	35260
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	1100	20		mg/Kg	5	12/1/2017 10:10:55 AM	G47476
Surr: BFB	1720	15-316	S	%Rec	5	12/1/2017 10:10:55 AM	G47476
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.098		mg/Kg	5	12/1/2017 10:10:55 AM	B47476
Toluene	ND	0.20		mg/Kg	5	12/1/2017 10:10:55 AM	B47476
Ethylbenzene	5.6	0.20		mg/Kg	5	12/1/2017 10:10:55 AM	B47476
Xylenes, Total	74	3.9		mg/Kg	50	12/1/2017 8:18:51 PM	B47476
Surr: 4-Bromofluorobenzene	159	80-120	S	%Rec	5	12/1/2017 10:10:55 AM	B47476

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
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1712001

Date Reported: 12/5/2017

CLIENT: Blagg Engineering

Client Sample ID: 2 @ 7' (95)

Project: TAPP LS 3A

Collection Date: 11/30/2017 1:30:00 PM

Lab ID: 1712001-003

Matrix: SOIL

Received Date: 12/1/2017 7:08:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	68	30		mg/Kg	20	12/1/2017 11:23:44 AM	35263
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	11000	980		mg/Kg	100	12/1/2017 11:31:48 AM	35260
Motor Oil Range Organics (MRO)	7700	4900		mg/Kg	100	12/1/2017 11:31:48 AM	35260
Surr: DNOP	0	70-130	S	%Rec	100	12/1/2017 11:31:48 AM	35260
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	6.3	4.8		mg/Kg	1	12/1/2017 10:57:48 AM	G47476
Surr: BFB	129	15-316		%Rec	1	12/1/2017 10:57:48 AM	G47476
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.024		mg/Kg	1	12/1/2017 10:57:48 AM	B47476
Toluene	ND	0.048		mg/Kg	1	12/1/2017 10:57:48 AM	B47476
Ethylbenzene	ND	0.048		mg/Kg	1	12/1/2017 10:57:48 AM	B47476
Xylenes, Total	ND	0.097		mg/Kg	1	12/1/2017 10:57:48 AM	B47476
Surr: 4-Bromofluorobenzene	86.2	80-120		%Rec	1	12/1/2017 10:57:48 AM	B47476

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
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1712001

Date Reported: 12/5/2017

CLIENT: Blagg Engineering

Client Sample ID: 2 @ 13' (95)

Project: TAPP LS 3A

Collection Date: 11/30/2017 1:40:00 PM

Lab ID: 1712001-004

Matrix: SOIL

Received Date: 12/1/2017 7:08:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	110	30		mg/Kg	20	12/1/2017 11:36:09 AM	35263
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	750	9.9		mg/Kg	1	12/1/2017 1:06:01 PM	35260
Motor Oil Range Organics (MRO)	310	50		mg/Kg	1	12/1/2017 1:06:01 PM	35260
Surr: DNOP	104	70-130		%Rec	1	12/1/2017 1:06:01 PM	35260
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	12/1/2017 1:42:03 PM	G47476
Surr: BFB	117	15-316		%Rec	1	12/1/2017 1:42:03 PM	G47476
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.025		mg/Kg	1	12/1/2017 1:42:03 PM	B47476
Toluene	ND	0.050		mg/Kg	1	12/1/2017 1:42:03 PM	B47476
Ethylbenzene	ND	0.050		mg/Kg	1	12/1/2017 1:42:03 PM	B47476
Xylenes, Total	ND	0.10		mg/Kg	1	12/1/2017 1:42:03 PM	B47476
Surr: 4-Bromofluorobenzene	85.1	80-120		%Rec	1	12/1/2017 1:42:03 PM	B47476

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
	PQL	Practical Quantitative Limit	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#: 1712001

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	MB-35263	SampType: mblk			TestCode: EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID: 35263			RunNo: 47471					
Prep Date:	12/1/2017	Analysis Date: 12/1/2017			SeqNo: 1516483		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-35263		SampType: Ics		TestCode: EPA Method 300.0: Anions					
Client ID:	LCSS		Batch ID: 35263		RunNo: 47471					
Prep Date:	12/1/2017		Analysis Date: 12/1/2017		SeqNo: 1516484		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.7	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
PQL Practical Quantitative Limit
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#: 1712001

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	LCS-35260		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 35260		RunNo: 47457					
Prep Date:	12/1/2017		Analysis Date: 12/1/2017		SeqNo: 1515167		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	89.8	73.2	114			
Surr: DNOP	3.8		5.000		75.8	70	130			

Sample ID	MB-35260	SampType: MBLK			TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID: 35260			RunNo: 47457					
Prep Date:	12/1/2017	Analysis Date: 12/1/2017			SeqNo: 1515168		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	8.4		10.00		83.7	70	130			

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
PQL Practical Quantitative Limit	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#: 1712001

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	RB	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	G47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516064	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	880		1000		88.5	15	316			

Sample ID	2.5UG GRO LCS	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	G47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516065	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	99.8	75.9	131			
Surr: BFB	1000		1000		104	15	316			

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
PQL Practical Quantitative Limit
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#: 1712001

05-Dec-17

Client: Blagg Engineering

Project: TAPP LS 3A

Sample ID	RB	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	B47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516095	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	0.85		1.000		84.6	80	120			

Sample ID	100NG BTEX LCS	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	B47476	RunNo:	47476					
Prep Date:		Analysis Date:	12/1/2017	SeqNo:	1516096	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.025	1.000	0	92.6	77.3	128			
Toluene	0.93	0.050	1.000	0	92.7	79.2	125			
Ethylbenzene	0.92	0.050	1.000	0	92.3	80.7	127			
Xylenes, Total	2.8	0.10	3.000	0	94.1	81.6	129			
Surr: 4-Bromofluorobenzene	0.87		1.000		86.6	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
PQL Practical Quantitative Limit
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: 1712001

RcptNo: 1

Received By: **Sophia Campuzano**

12/1/2017 7:08:00 AM

Sophia Campuzano

Completed By: **Anne Thorne**

12/1/2017 7:36:17 AM

Anne Thorne

Reviewed By: **DDS**

12/01/17

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 $>0^{\circ}\text{C}$ 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 $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.1	Good	Yes			

Chain-of-Custody Record		Turn-Around Time:	SAME DAY
Client:	BLAGG ENGR. / BP AMERICA	☐ Standard	☒ Rush
Mailing Address:	P.O. BOX 87	Project Name:	
	BLOOMFIELD, NM 87413	TAPP LS # 3A	
Phone #:	(505) 632-1199	Project #:	
email or Fax#:		Project Manager:	
QA/QC Package:		NELSON VELEZ	
☒ Standard	☐ Level 4 (Full Validation)	Sampler:	
Accreditation:		NELSON VELEZ	
☐ NELAP	☐ Other _____	On Ice: ☒ Yes ☐ No	
☐ EDD (Type) _____		Sample Temperature: 3.9 - 1.8 (C) = 21.4 (F)	

Turn-Around Time:

**SAME
DAY**

☐ Standard☒ Rush

Project Name:

TAPP LS #3A

Project #:

Project Manager:

NELSON VELEZ**Sampler:****NELSON VELEZ**

On-line

☒ Yes☐ No

Sample Temperature $3.9-1.8(^{\circ}\text{C})=21.9^{\circ}\text{C}$

121117
Container
Type and #
meat kfs

Preservative
Type

HEAL No

1717 MI

67EX ONLY
67EX-1MSE-EMD-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, NO₃, NO₂, PO₄, SO₄)

8081 Pesticides / 8082 PCB's

8260B (VOA)

8270 (Semi-VOA)

Chloride (soil - 300.0 / water - 300.1)

Grab sample

pt. composite sample

Air Bubbles (Y or N)

Date	Time	Matrix	Sample Request ID	Container Type and # 121117 MeatKts	Preservative Type	HEAL No. 1712061
11/30/17	1153	SOIL	1 @ 8.5' (95)	4oz.-1	Cool	201
11/30/17	1220	SOIL	1 @ 13' (95)	4oz.-1	Cool	202
11/30/17	1330	SOIL	2 @ 7' (95)	4oz.-1	Cool	203
11/30/17	1340	SOIL	2 @ 13' (95)	4oz.-1	Cool	204

Date: 11/30/17	Time: 1710	Relinquished by: 	Received by: 	Date 11/30/17	Time 1710
Date: 12/1/17	Time: 0708	Relinquished by: 	Received by: 	Date 12/01/17	Time 0708



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

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

Analysis Request

[illegible]

Remarks:	<u>BILL DIRECTLY TO BP USING THE CONTACT WITH CORRESPONDING VID</u> <u>& REFERENCE # WHEN APPLICABLE;</u>
CONTACT:	ERIN GARIFALOS / VANCE HIXON
VID:	VHIXONEVRM
Reference #	P - 881

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.

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

Form C-144
July 21, 2008

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

- 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: TAPP LS 003A
API Number: 3004523695 OCD Permit Number: _____
U/L or Qtr/Qtr I Section 15.0 Township 28.0N Range 08W County: San Juan County
Center of Proposed Design: Latitude 36.65874 Longitude -107.66245 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 _____

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:** A
Volume: 95.0 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 SIDE WALLS 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.

29

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 4' Hogwire with single barbed wire

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	☐ Yes ☒ No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☒ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☒ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☒ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☒ No

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 identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please provide the information below) ☐ No

Required for impacted areas which will not be used for future service and operations:

- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste.

- 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): Jeffrey Peace Title: Field Environmental Advisor

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

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

20.

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

OCD Representative Signature: Rundegufu Approval Date: 03 MAR 17

Title: HYDROLOGIST 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:

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 Longitude 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): Title:

Signature: Date:

e-mail address: Telephone:

SITING AND HYDRO-GEOLOGICAL REPORT FOR TAPP LS 003A

Siting Criteria 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be greater than 100 feet. This estimation is based on data from Stone and others (1983), and depth to groundwater data obtained from water wells permitted by the New Mexico State Engineer's Office (OSE, Figure 1). Local topography and proximity to adjacent water features is also considered. A topographic map of the site is provided as Figure 2 and demonstrates that the below grade tank (BGT) is not within 300 feet of any continuously flowing watercourse or within 200 feet of any other significant watercourse, lakebed, sinkhole or playa lake as measured from the ordinary high water mark. Figure 3 demonstrates that the BGT is not within 300 feet of a permanent residence, school, hospital, institution or church. Figure 4 demonstrates, based on a search of the OSE database and USGS topographic maps, that there are no freshwater wells or springs within 1000 feet of the BGT. Figure 5 demonstrates that the BGT is not within a municipal boundary or a defined municipal freshwater well field. Figure 6 demonstrates that the BGT is not within 500 feet of a wetland. Figure 7 demonstrates that the BGT is not in an area overlying a subsurface mine. The BGT is not located in an unstable area. Figure 8 demonstrates that the BGT is not within the mapped FEMA 100-year floodplain.

Local Geology and Hydrology

This particular site is located on the Jasis Mesa adjacent to the main channel of Jasis Canyon and near the junction with Carrizo Canyon. Regional topography of Largo Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The more resistant cliff-forming sandstones of the San Jose Formation cap the interbedded siltstones, shales and sandstones of the Nacimiento Formation. Accumulations of talus and eroded sands at the base of canyon walls form steep to gentle slopes that transition into flat-bottomed arroyos within the canyons. Deposits of Quaternary alluvial and eolian sands occur prominently near the surface of Largo Canyon, especially near streams and washes.

Regional Geology and Hydrology

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

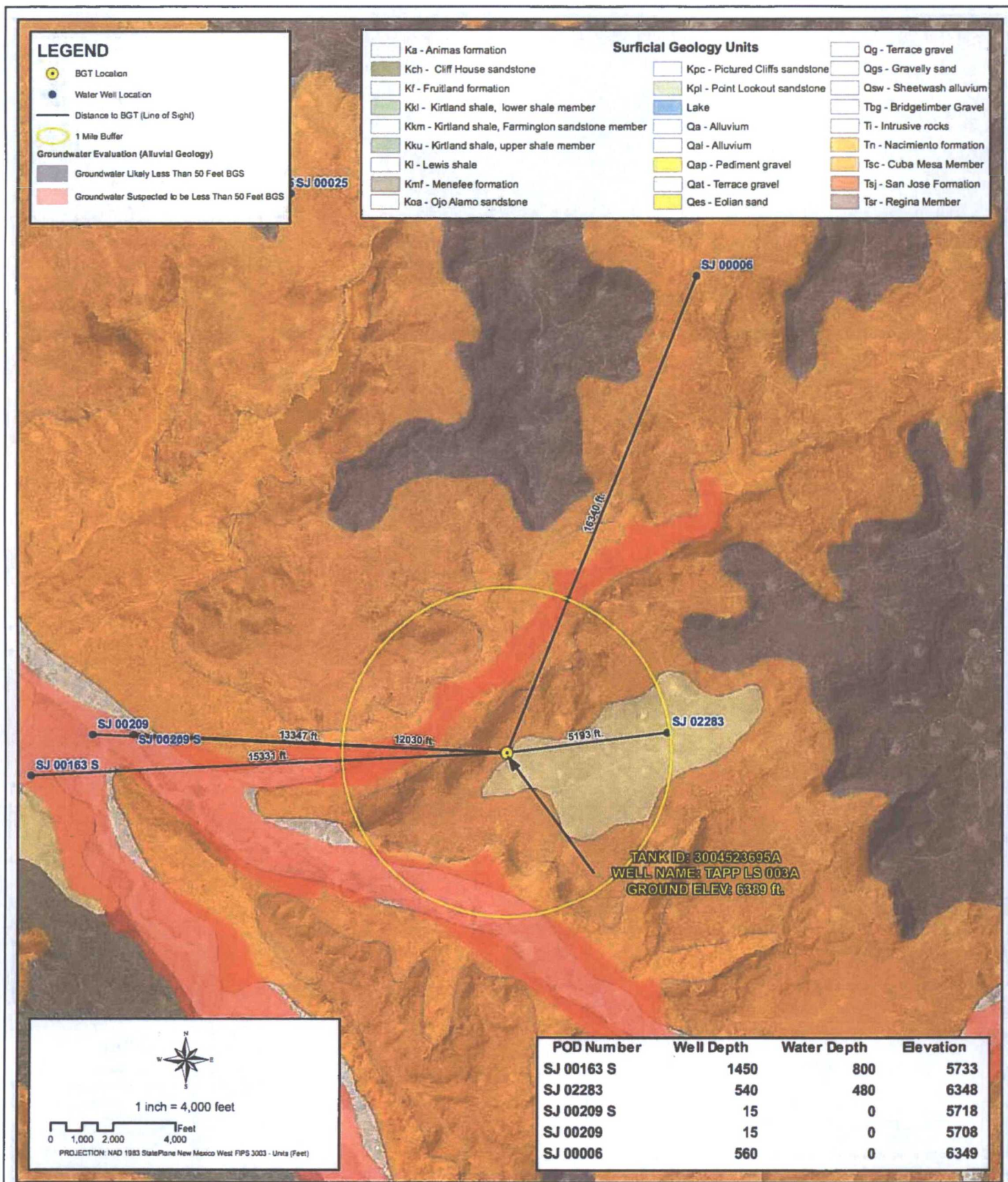
Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The San Jose Formation of Eocene age

occurs in both New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado-New Mexico border and overlies the Animas Formation in the general area north of the State Line. The San Jose Formation was deposited in various fluvial-type environments. In general, the unit consists of an interbedded sequence of sandstone, siltstone, and shale. Thickness of the San Jose Formation increases from west to east. Groundwater is associated with alluvial and fluvial sandstone aquifers. The occurrence of groundwater is mainly controlled by distribution of sandstone in the formation. The reported or measured discharge from numerous water wells completed in the formation range from 0.15 to 61 gallons per minute (gpm) and with a median of 5 gpm. Most of the wells provide water for livestock and domestic purposes. The formation is suitable for recharge from precipitation due to overlying soils being sandy, highly permeable and absorbent. Low annual precipitation, relatively high transpiration and evaporation rates and deep dissection of the formation by the San Juan River and its main tributaries all tend to reduce the effective recharge to the formation. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation of Paleocene age are between 0 and 1000 feet deep in the majority of the basin as well (Stone et al., 1983).

References

Circular 154—Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p



GROUNDWATER LESS THAN 50 FT.

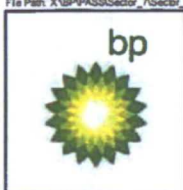
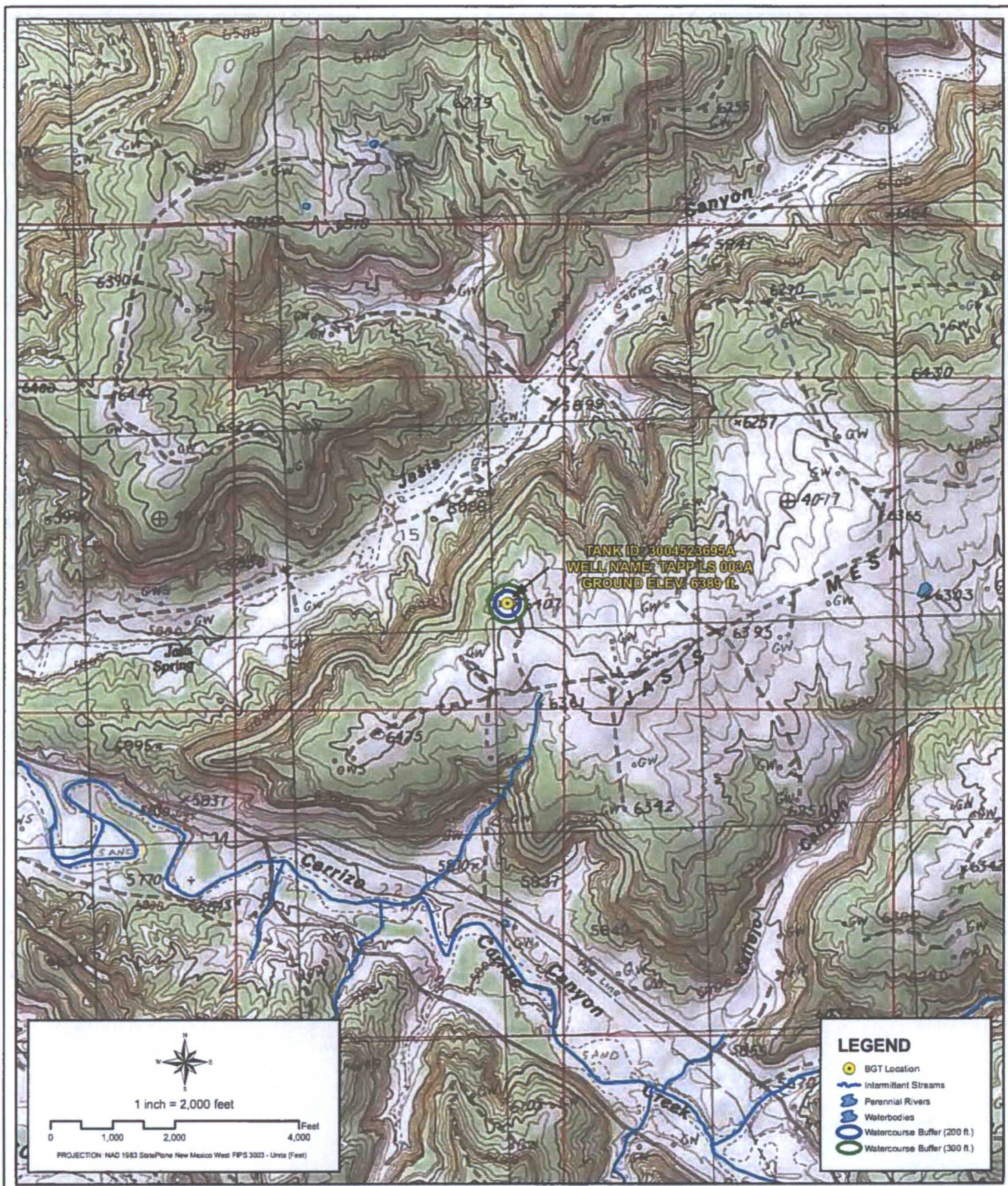
WELL NAME: TAPP LS 003A

API NUMBER: 3004523695 TANK ID: 3004523695A

SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

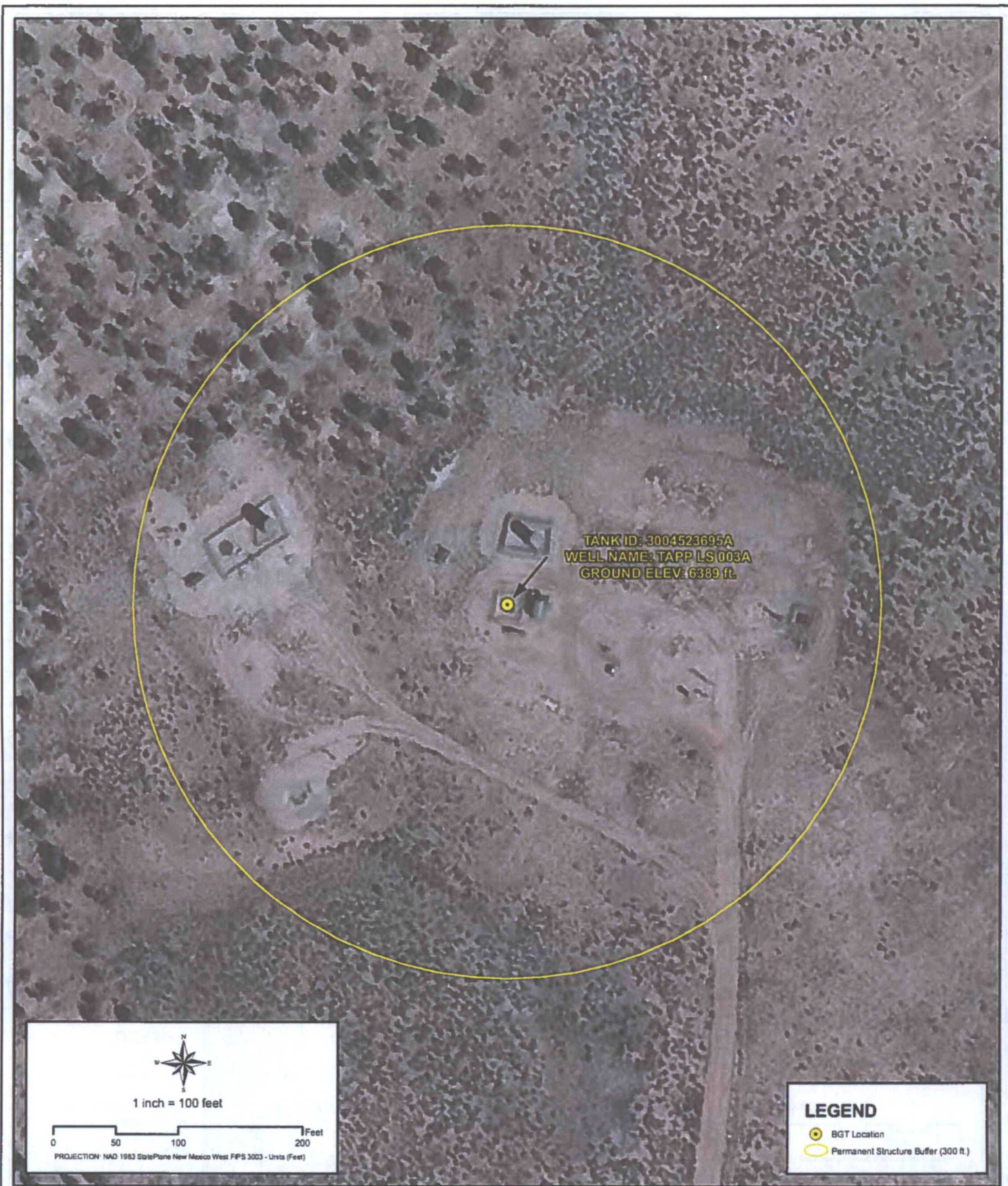
FIGURE

1



PROXIMITY TO WATERCOURSES
WELL NAME: TAPP LS 003A
 API NUMBER: 3004523695 TANK ID: 3004523695A
 SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE
2

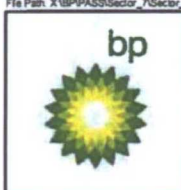
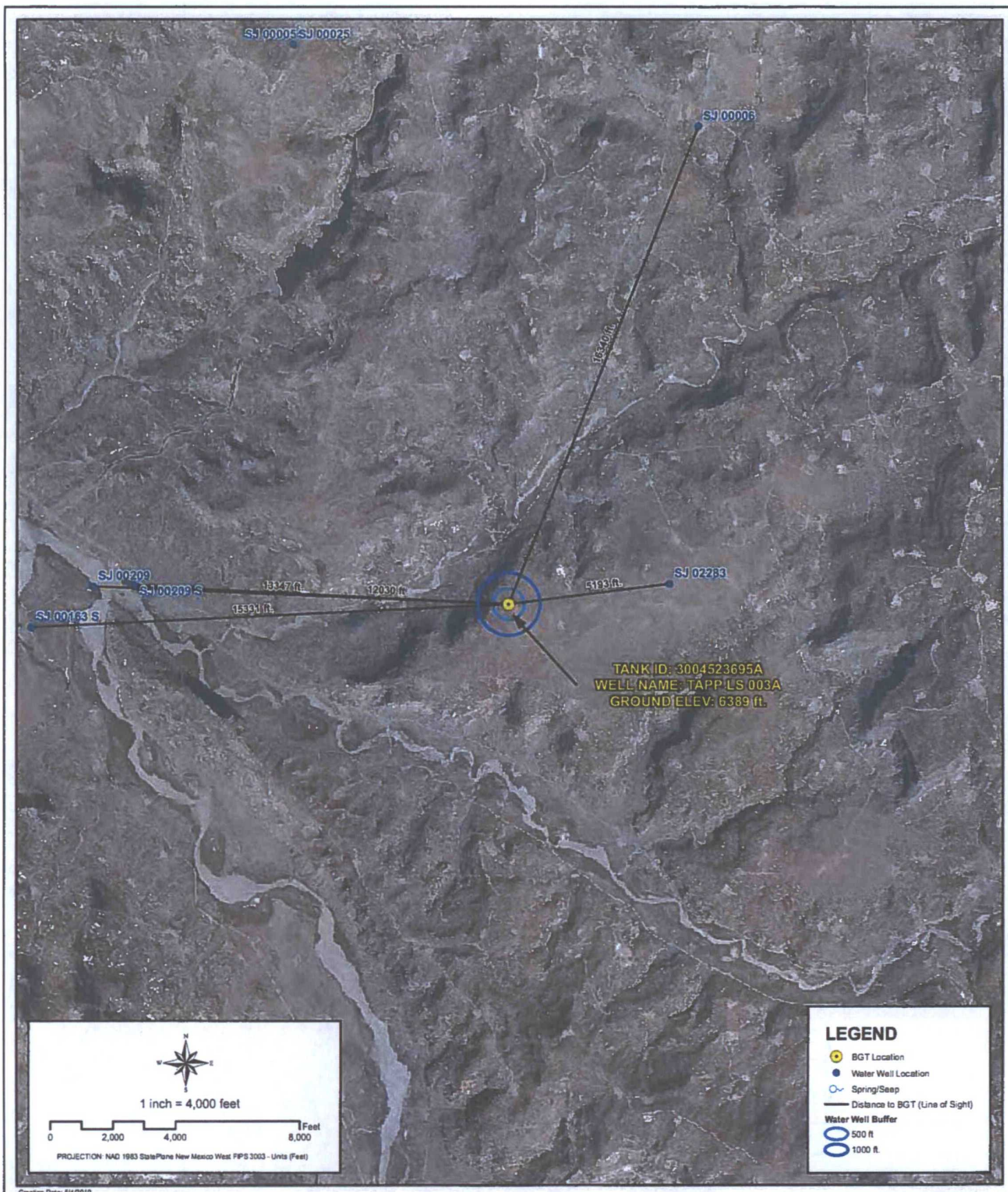


PROXIMITY TO PERMANENT STRUCTURE

WELL NAME: TAPP LS 003A

API NUMBER: 3004523695 TANK ID: 3004523695A
SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE
3



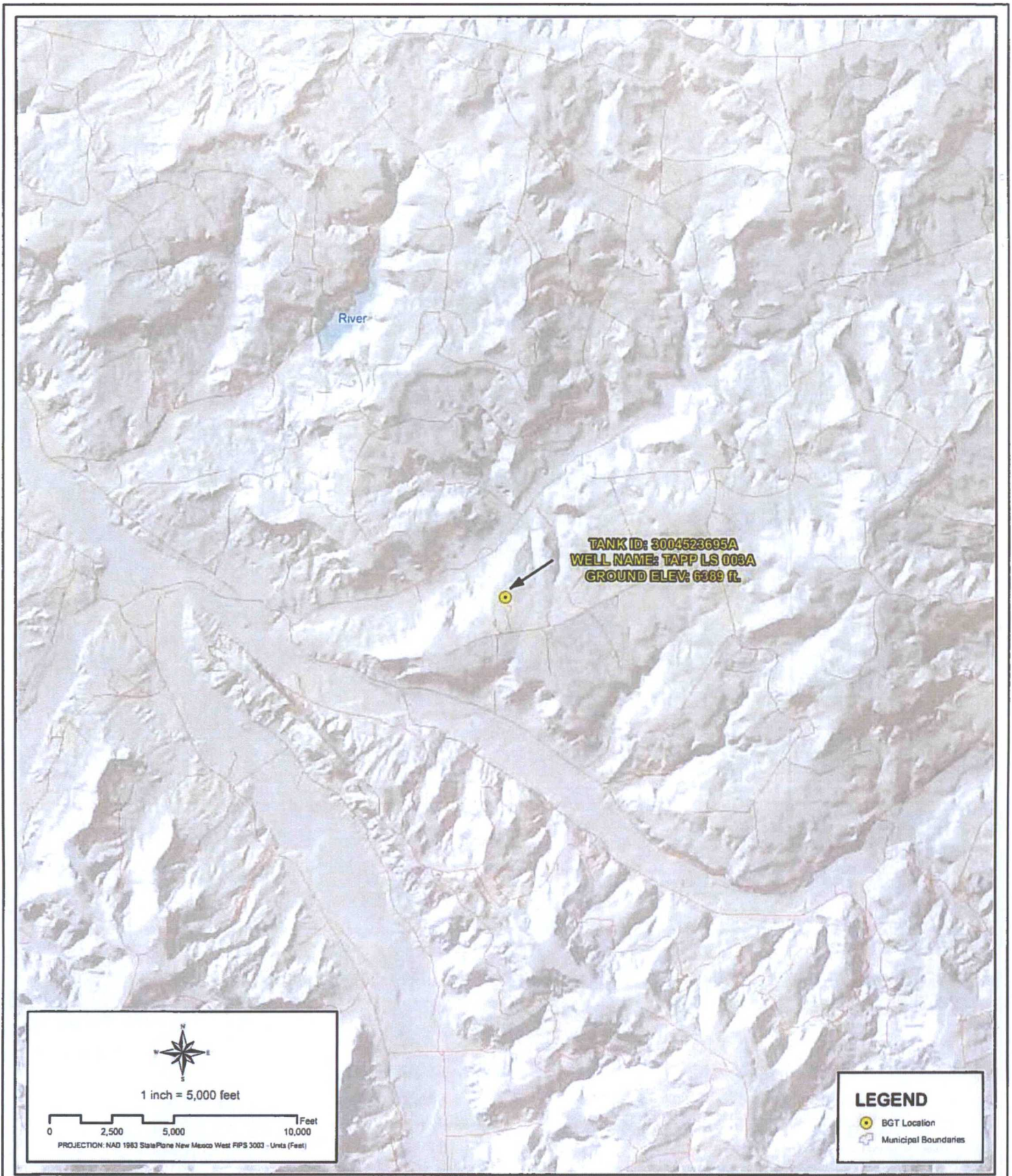
PROXIMITY TO WATER WELLS

WELL NAME: TAPP LS 003A

API NUMBER: 3004523695 TANK ID: 3004523695A
SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE

4



Creation Date: 5/4/2010

File Path: X:\BP\PASS\Sector_7\CW\DX\0004523695A.mxd

Created by: PRW

Reviewed by: AGH

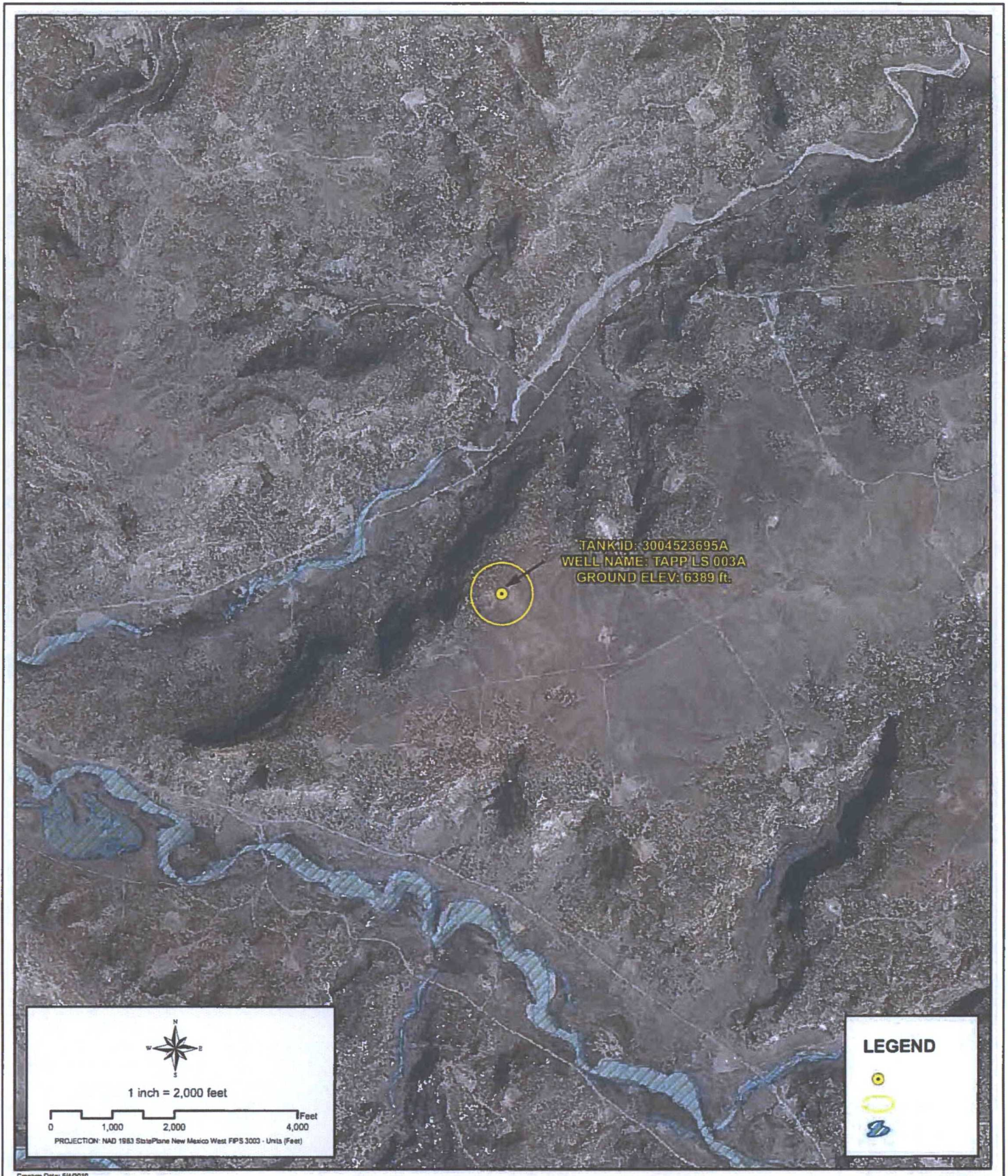


PROXIMITY TO MUNICIPAL BOUNDARY

WELL NAME: TAPP LS 003A

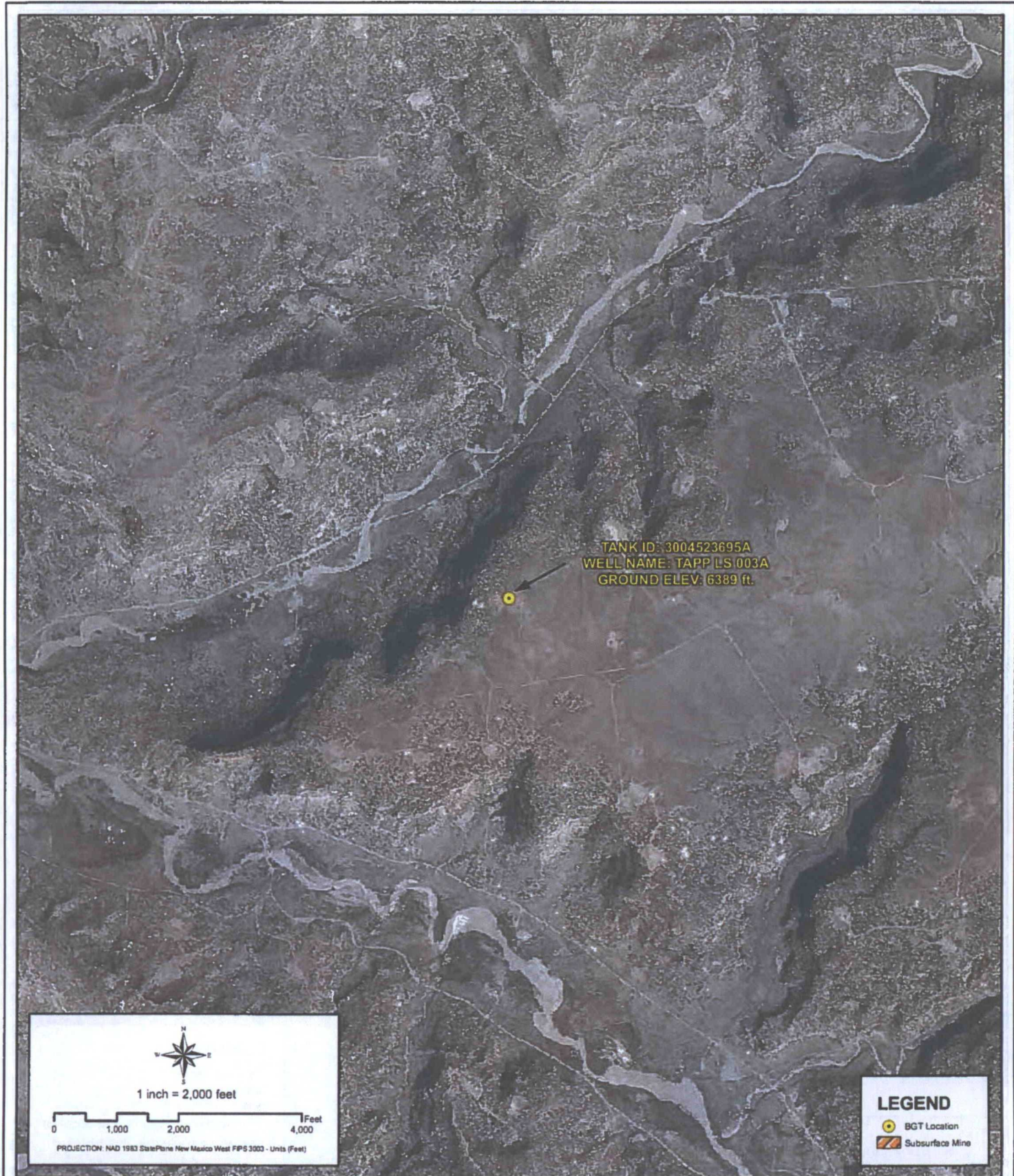
API NUMBER: 3004523695 TANK ID: 3004523695A
SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE
5

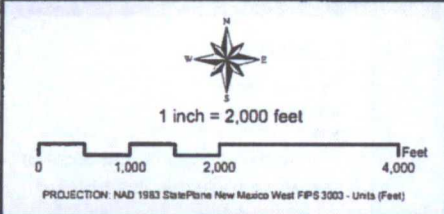


PROXIMITY TO WETLANDS
WELL NAME: TAPP LS 003A
API NUMBER: 3004523695 TANK ID: 3004523695A
SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE
6



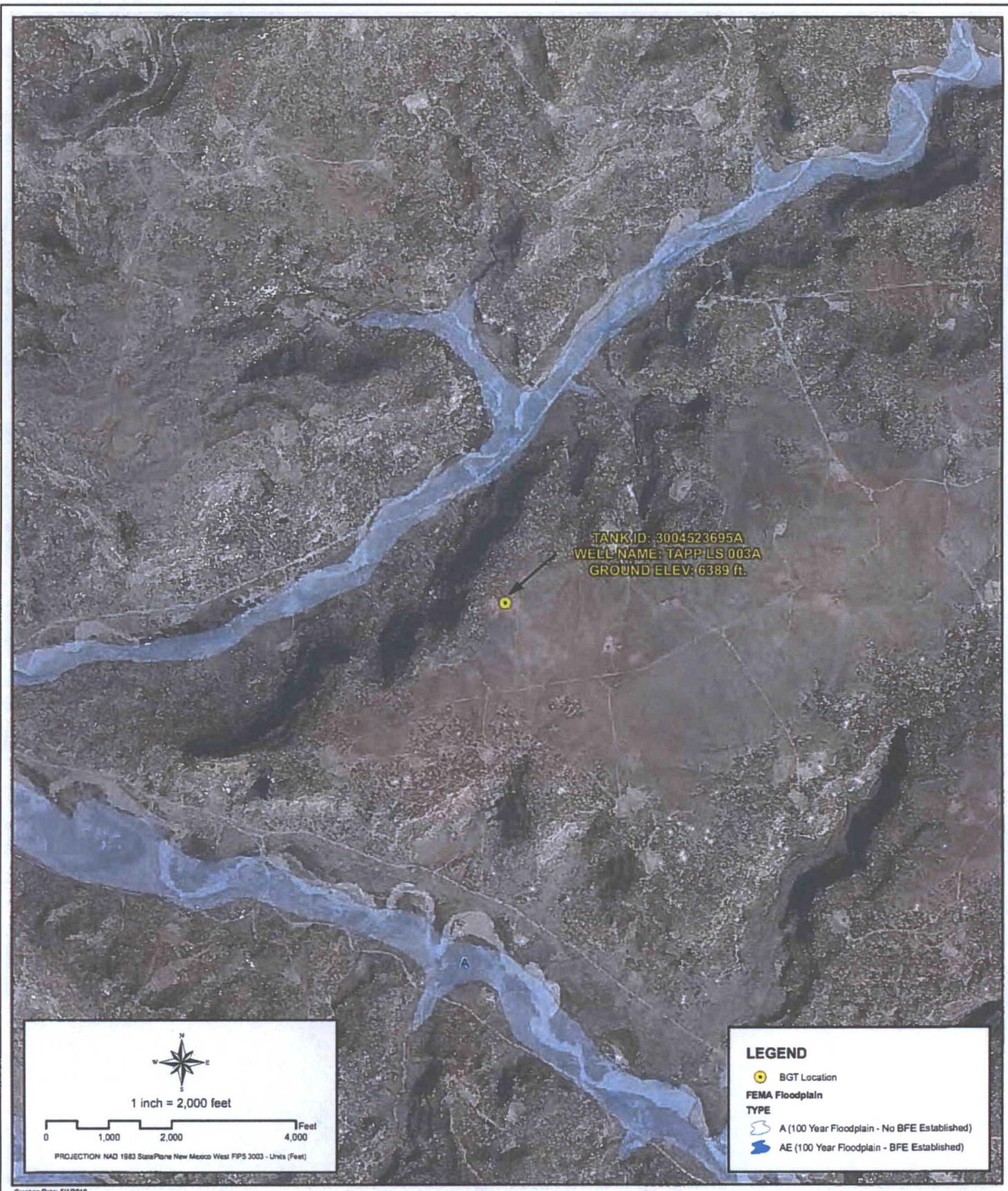
TANK ID: 3004523695A
WELL NAME: TAPP LS 003A
GROUND ELEV: 6389 ft.



LEGEND
● BGT Location
— Subsurface Mine

Creation Date: 5/4/2016
File Path: X:\BP\PASS\Sector_7\Sector_7C\MOXD\G004523695A.mxd

	PROXIMITY TO SUBSURFACE MINES WELL NAME: TAPP LS 003A API NUMBER: 3004523695 TANK ID: 3004523695A SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M.NM23	FIGURE 7
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PROXIMITY TO FLOODPLAIN
WELL NAME: TAPP LS 003A
API NUMBER: 3004523695 TANK ID: 3004523695A
SECTION 15, TOWNSHIP 28.0N, RANGE 08W, P.M. NM23

FIGURE
8

SOUTHERN SAN JUAN BASIN (SSJB)

Figure Citation List

March 2010

Figure 1: Groundwater Less Than 50 ft.

Layers:

Water Wells: **iWaters Database: NMOSE/ISC (Dec. 2009)**

New Mexico Office of the State Engineer (OSE) /ISC iWaters database. (Data updated: 12/2009. Data received: 03/09/2010). Data available from:
http://www.ose.state.nm.us/waters_db_index.html.

Cathodic Wells: **Tierra Corrosion Control, Inc. (Aug. 2008)**

Tierra Corrosion Control, Inc. 1700 Schofield Ln. Farmington, NM 87401. Driller's Data Log. (Data collected: All data are associated with cathodic protection wells installed at BP facilities between 2008-2009. Data received: 05/06/2010).

Hydrogeological Evaluation: **Wright Water Engineers, Inc. (2008)**

Evaluation completed by Wright Water Engineers, Inc. Durango Office. Data created using digital statewide geology at 1:500,000 from USGS in combination with 10m Digital Elevation Model (DEM) from NRCS. (Data compiled: 2008.)

Results: Spatial Polygons representing "Groundwater likely to be less than 50 ft." and "Groundwater suspected to be less than 50 ft."

Surficial Geology: **USGS (1963/1987)**

Data digitized and rectified by Geospatial Consultants. (Data digitized: 03/23/2010). Original hard copy maps sourced from United States Geological Survey (USGS). Data available from:
<http://pubs.er.usgs.gov/>.

Geology, Structure and Uranium Deposits of the Shiprock Quadrangle, New Mexico and Arizona. 1:250,000. I - 345. Compiled by Robert B. O'Sullivan and Helen M. Beikman. 1963.

Geologic Map of the Aztec 1 x 2 Quadrangle, Northwestern New Mexico and Southern Colorado. 1:250,000. I - 1730. Compiled by Kim Manley, Glenn R. Scott, and Reinhard A. Wobus. 1987.

Aerial Imagery: **Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name:
NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 2: Proximity to Watercourses

Layers:

Perennial Streams:

NHD, USGS (2010)

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital Representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

Intermittent Streams:

NHD, USGS (2010)

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital Representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

Water Bodies:

NHD, USGS (2010)

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

USGS Topographic Maps:

USGS (2007)

USGS 24k Topographic map series. 1:24000. Maps are seamless, scanned images of USGS paper topographic maps. Data available from: <http://store.usgs.gov>.

Figure 3: Proximity to Permanent Structure

Layers:

Aerial Imagery:

Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 4: Proximity to Water Wells

Layers:

Water Wells: **iWaters Database: NMOSE/ISC (Dec. 2009)**

New Mexico Office of the State Engineer (OSE) /ISC iWaters database. (Data updated: 12/2009. Data received: 03/09/2010). Data available from:
http://www.ose.state.nm.us/waters_db_index.html.

Springs/Seeps: **NHD, USGS (2010)**

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital representation of USGS 24k Topographic map series with field updates as required. Data available from:
<http://nhd.usgs.gov/>.

Aerial Imagery: **Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name:
NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 5: Proximity to Municipal Boundary

Layers:

Municipal Boundary: **San Juan County, New Mexico (2010)**

Data provided by San Juan County GIS Division. (Data received: 03/25/2010).

Shaded Relief: **NED, USGS (1999)**

National Elevation Dataset (NED). U.S. Geological Survey, EROS Data Center. (Data created: 1999. Data downloaded: April, 2010). Resolution: 10 meter (1/3 arc-second). Data available from: <http://ned.usgs.gov/>.

StreetMap North America: **Tele Atlas North America, Inc., ESRI (2008)**

Data derived from Tele Atlas Dynamap/Transportation North America, version 5.2. (Data updated: annually. Data series issue: 2008).

Figure 6: Proximity to Wetlands

Layers:

Wetlands:

NWI (2010)

National Wetlands Inventory (NWI). U.S Fish and Wildlife Service. (Data last updated: 09/25/2009. Data received: 03/21/2010). Data available from: <http://www.fws.gov/wetlands/>.

Aerial Imagery:

Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name:
NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 7: Proximity to Subsurface Mine

Layers:

Subsurface Mine:

NM Mining and Minerals Division (2010)

New Mexico Mining and Minerals Division. (Data received: 03/12/2010). Contact: Susan Lucas Kamat, Geologist. Provided PLSS NM locations (Sections) for the two subsurface mines located in San Juan and Rio Arriba counties.

Aerial Imagery:

Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name:
NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

Figure 8: Proximity to FEMA Floodplain

Layers:

FEMA Floodplain:

FEMA (varying years)

Data digitized and rectified by Wright Water Engineers, Inc. (Data digitized: August 2008).
Digitized from hard copy Flood Insurance Rate Maps (FIRMs) (varying years) of San Juan County.

Aerial Imagery:

Conoco (Summer 2009)

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery.
Projected coordinate system name:
NAD_1983_StatePlane_New_Mexico_West_FIPS_3003_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

BP AMERICA PRODUCTION COMPANY

San Juan Basin in Northwest New Mexico Below-Grade Tank Design and Construction Plan

Pursuant to Rule 19.15.17.11 NMAC, BP America Production Company (BP) shall construct a below-grade tank (BGT) or modify an existing permitted BGT according to the following plan. Any deviations from this plan will be addressed on the New Mexico Oil Conservation Division's (NMCOD) form C-144 at the time of submittal.

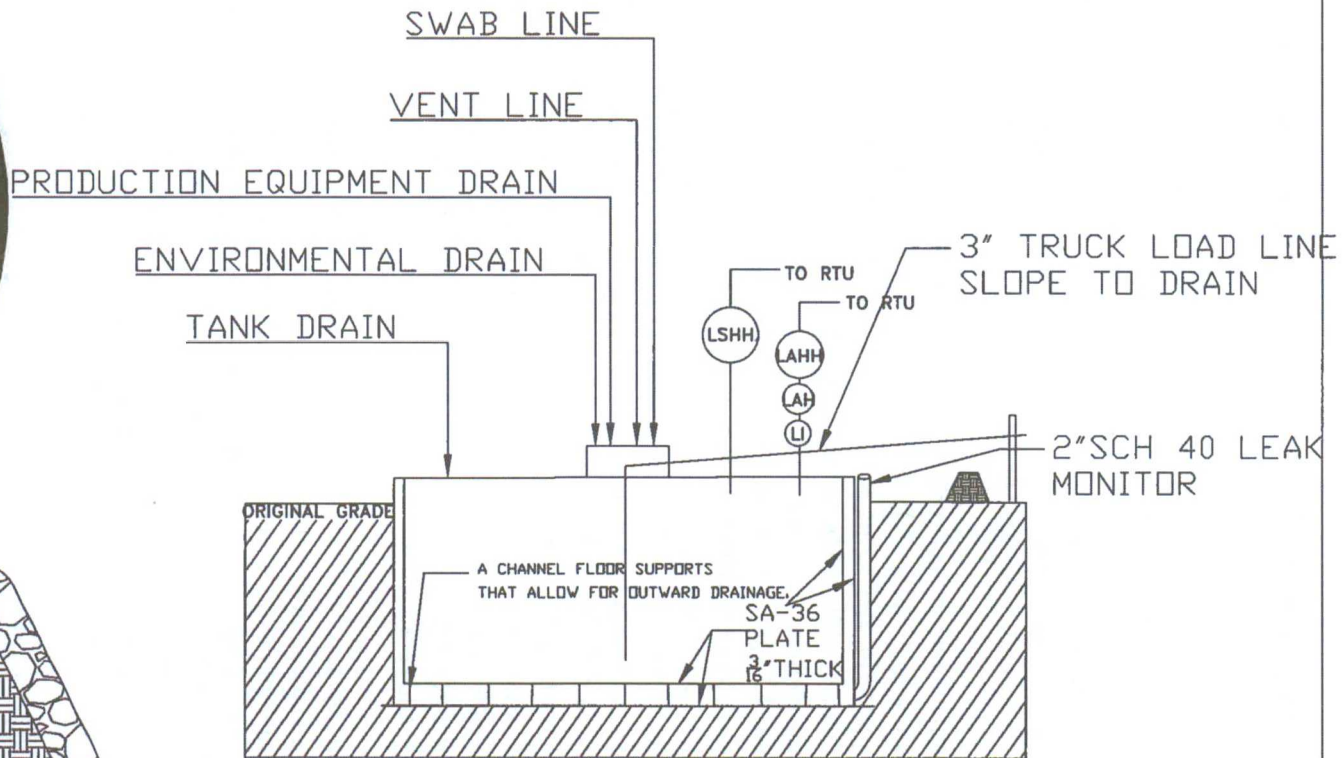
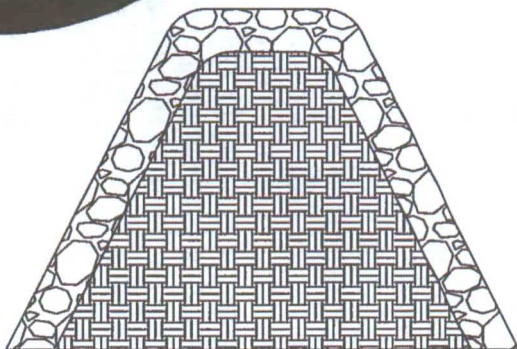
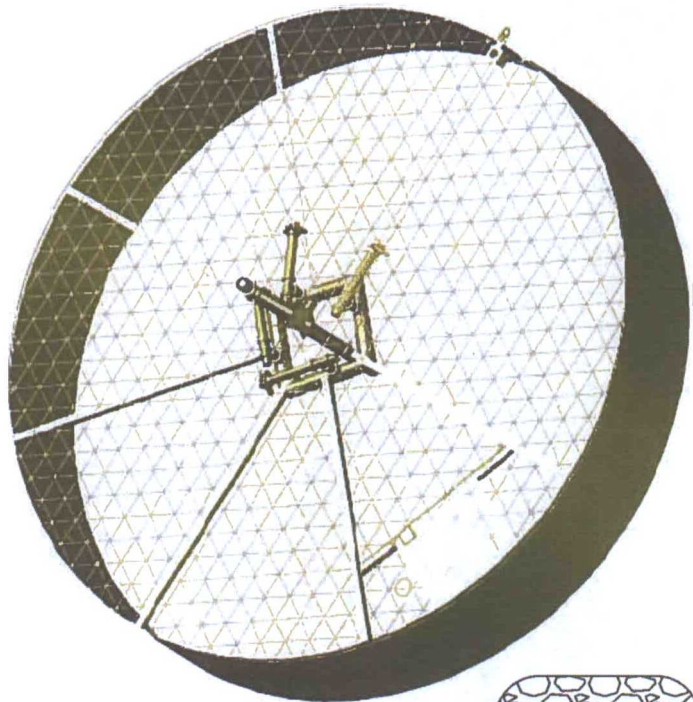
Design and Construction Plan

1. BP will design and construct a BGT which will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment.
2. BP is the well operator and shall install and maintain a well sign that is in compliance with 19.15.16.8 NMAC. The sign will be posted at the well site to address, at a minimum;
 - a. Well Number
 - b. Property name
 - c. Operators name
 - d. Location by footage, quarter-quarter section, township and range (or unit letter)
 - e. API number
 - f. Emergency contact information
3. BP will fence or enclose its BGTs in a manner that prevents unauthorized access and shall maintain its fence in good repair.
4. BP will fence or enclose a BGT located within 1,000 feet of a permanent residence, school, hospital, institution or church with, at a minimum a chain link security fence at least six (6) feet in height with at least two (2) strands of barbed wire at the top. BP will ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site.
5. BP is requesting NMOCD's approval for an alternative fence design that provides, at a minimum, equivalent protection to the design specified in Paragraph 3 of Subsection D of 19.15.17.11 NMAC for BGTs beyond the stated distance in paragraph 4 of this document. BP's proposed design for its BGTs will utilize 48" steel mesh field-fence (hogwire) with a metal or steel top rail. Perimeter T-post will be installed roughly every 10 feet.
6. BP will construct an expanded metal covering that completely covers the top of the BGT. The covering will be constructed such that it will prevent hazardous conditions to wildlife, including migratory birds
7. BP shall construct the BGT of materials that are resistant to produced water, any contained liquids, and damage from sunlight. BP's BGTs will be constructed of carbon steel that meets the requirements of ASTM A36.
8. BP's BGTs shall have a properly constructed earthen foundation consisting of a level base free of rocks, debris, sharp edges, or irregularities as to prevent punctures, cracks or indentations to the tank bottom as demonstrated on the design drawing.
9. BP will construct and operate the BGT to prevent surface water run-on by using both earthen

berms and leaving a portion of the BGT above the original grade as demonstrated on the design drawing.

10. BP will construct and operate the BGT to prevent overflow and overfilling of the BGT. Overflow will be prevented by use of an electronic high fluid level detector that will automatically engage an electronic shut-off valve when a 1 foot freeboard is reached. The Hi-level automatic alarm notifies well optimizers when liquid level has reached within a pre-set distance to the top of the BGT. The Hi Hi alarm will trigger the Hi-level automatic shutdown valve which will close in the well until the liquid level can be lowered.
11. BP will construct and install a double-walled tank design per Subparagraph (b) of Paragraph (4) of Subsection I of 19.15.17.11 NMAC with a two (2) inch diameter leak detection port. The floor supports located in the annular space of the tank bottom will be channeled to allow outward movement of liquid between the walls. Leak detection will be monitored per BP's Operating and Maintenance Plan. The walls of the BGT will be constructed of carbon steel that meets the ASTM A36 standard. BP's BGT design will insure containment of tank contents and protect underlying groundwater. The production equipment line drain is an automated drain that allows water level in production equipment (generally the separator) to be maintained within the equipment's operating parameters. The environmental drain is a manually operated drain that is used to drain liquids off of equipment. The tank drain is a manually operated drain, typically in the closed position that is used to rid the condensate tank of any water accumulation. The vent drain is a manually operated drain off the discharge of production equipment (usually the separator) and is used to blowdown the wellsite. The swab drain line is a manually operated drain originating between the wellhead and separator and is used during well workovers when large amounts of liquid are removed from the well and sent straight to the BGT.
12. BP owned and operated BGTs that were constructed and installed prior to June 16, 2008 that do not meet all the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC and are not included in Paragraph (6) of Subsection I of 19.15.17.11 NMAC are not required to equip or be retrofit to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as the BGT demonstrates integrity. If the existing BP BGT does not demonstrate integrity, BP shall promptly remove the BGT and install a BGT that complies with the BP NMOCD approved BGT design attached to the Design and Construction Plan. BP shall comply with the operational requirements of 19.15.17.12 NMAC.
13. BP owned and operated BGTs that were constructed and installed prior to June 16, 2008 that are single walled and where any portion of the tank side wall is below ground surface and not visible shall be retrofit or replaced to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or shall be closed within 5 years of June 16, 2008. If the existing BP owned and operated BGT does not demonstrate integrity, BP shall promptly remove the BGT and install a BGT that complies with the BP NMOCD approved BGT design attached to the Design and Construction Plan. BP shall comply with the operational requirements of 19.15.17.12 NMAC.
14. The general specifications for the design and construction of the BGT have been provided in the attached BP design and construction schematic.

DOUBLE WALLED BGT



PROPERLY CONSTRUCTED FOUNDATION CONSISTING OF A LEVEL BASE FREE OF ROCKS, DEBRIS, SHARP EDGES OR IRREGULARITIES TO PREVENT PUNCTURES CRACKS OR INDENTATIONS TO THE TANK BOTTOM.

- 1) MANUAL OPERATION
- 2) PRODUCTION TANK DRAIN LINE
- 3) SWAB LINE
- ENVIRONMENTAL DRAIN
- AUTOMATED OPERATION
- 1) VENT LINE DRAIN LINE
- 2) SEPARATOR DRAIN LINE
- 3) AUTOMATIC SHUT OFF LSHH ACTIVATES AT 12" FROM TOP OF TANK



Rev	By	Date	Revised	Rev	By	Date
1	SKL	9/0				

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SAN JUAN OPERATIONS CENTER				
FARMINGTON, NEW MEXICO				
BP AMERICA PRODUCTION COMPANY				
FACILITIES LAYOUT				
DOUBLE WALLED BELOW GRADE TANK				
Sheet	Drawn By	Date	Checked By	Rev. No.
1				1
Filename: FTY 8888L-020-FTT 01-00.dwg				

BP AMERICA PRODUCTION COMPANY

San Juan Basin in Northwest New Mexico
Below-Grade Tank Operating and Maintenance Plan

Pursuant to Rule 19.15.17.12 NMAC, BP America Production Company (BP) shall maintain and operate a below-grade tank (BGT) with the following requirements. Deviations from this plan will be addressed with a submittal to the New Mexico Oil Conservation Division's (NMOCD) using form C-144 at the time of the BGT permit or modification to an existing permitted BGT application.

Operating and Maintenance Plan

1. BP's BGTs will be operated and maintained to contain liquids and solids and promptly identify a release or potential release. BP's BGTs will be operated and maintained to prevent contamination to freshwater and protect public health and the environment. BP will use automated high fluid level alarms and automated shut-off valves to insure that liquids are contained within the vessel and that the vessel does not overflow. These alarms and shut-off valves will be consistent with those demonstrated in the design plan. BP will perform and document inspections of the BGTs on a monthly basis to confirm the integrity of the vessel.
2. BP will not knowingly discharge or store any hazardous waste into a BGT
3. If a BGT develops a leak, or a release occurs due to mechanical failure or vandalism, or if a penetration of the BGT occurs below the liquid's surface, BP shall: 1) evacuate liquids from the BGT to a level below the damage or leak line within 48 hours; and 2) notify the NMOCD's District III office within 48 hours of the discovery. BP will review #4 of the BP Operating and Maintenance plan prior to any repair or replacement to determine if the BGT and location will require closure. If appropriate BP shall repair or replace the BGT with the BP NMOCD approved design. If a release from the BGT occurs BP shall follow the release reporting procedures of 19.15.29 NMAC. If closure of the BGT is required, BP shall implement the approved closure plan for the BGT.
4. If a BP operated BGT that was constructed and installed prior to June 16, 2008 that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC does not demonstrate integrity or if the BGT develops any of the conditions identified in Paragraph (5) of Subsection A of 19.15.17.12 NMAC, BP shall close the existing BGT pursuant to the closure requirements of 19.15.17.13 NMAC and will install a BGT that complies with BP NMOCD approved BGT design attached to the Design and Construction Plan.
5. If a BP operated BGT that was constructed and installed prior to June 16, 2008 that does not comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is equipped or retrofit to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, BP shall visually inspect the area beneath the BGT during the retrofit and shall document any areas that are wet, discolored or showing other evidence of a release on Form C-141. BP shall demonstrate to the division whether evidence of contamination indicates that an imminent threat to fresh water, public health, safety or the environment exists. If the division

6. BP will install and construct the BGT following the BP NMOCD approved Design and Construction Plan, and will control surface water run on by the use of a berm or leaving a portion of the tank wall exposed. BP will use high level shot-off devices to insure that the BGT does not overflow.
7. The following requirements adhere to Subsection D of 19.15.17.12 NMAC.
 - a. BP will remove any visible or measurable layer of oil from the fluid surface of the BGT.
 - b. BP will inspect the BGT monthly. The monthly inspection will consist of the following:
 - i. Personnel will conduct a walk-around of the BGT to observe any abnormalities or signs of corrosion on the vessel. Personnel will inspect the surface run-on berm. Where applicable, inspection of the BGT's double wall – double bottom inspection port, tank flanges and valves for signs of leakage or spills will be conducted. Personnel will record any BGT deficiencies, repair as necessary and report to BP Dispatch Office immediately if an imminent danger to fresh water, public health, or to the environment is observed. BP will maintain a written record of the monthly inspections on the BP inspection form referred to as the San Juan Lease Inspection Form. BP will maintain these written records for at least five (5) years. A copy of the San Juan Lease Inspection Form is attached.
8. BP will maintain sufficient freeboard of one foot in the BGT to prevent overtopping.

Managed Form NOP-5878 Revision 1

San Juan Lease Inspection

Custodian: Field Environmental Coordinator

Date: Run:

Location:

Name of Inspector:

Yes Action N/A

Required Signs

Does location have Well Sign and emergency phone number?

Do compressor engines have Hearing Protection signs?

Hydrogen Sulfide Signs (where applicable)

Chemical containers and tanks have proper Hazcom label or BP Multi-Product Hazcom numbers?

Yes Action N/A

Location- General**Housekeeping satisfactory?**

Tripping or falling hazards are absent? If NO, identify and report to FSC.

Rig anchors/Deadmen adequately marked and visible if they present a hazard to drivers?

Driving hazards such as risers are marked or flagged?

Painting meets safety standards?

Cattleguards/gates properly maintained?

Tarps in good repair?

Seeps, drips, or leaks are absent?

Is weed control adequate?

Stains on ground are absent? If NO, remediate immediately, identify and report to FEC.

Are there any open ended valves that are not plugged?

Yes Action N/A

Vessel/Tank

Adequate fencing around below grade tank?

Are the dike/berm walkover in place, used and stable?

Are dikes/berms in good condition?

Is there adequate and safe access to pit for gauging?

Does the pit have a high level alarm?

Are stairways and catwalks properly maintained and in good condition?

Toprail, midrail and toeboard in place?

Are thief hatches in good condition, seal properly, and in the closed position?

Is tank vent line equipped with a PV valve? (Enardo)

Does the tank have a high level alarm?

Are open ended load lines and pipes capped?

Is soil around load lines clean of oil stains?

Is tank area free of any evidence of seeps or leaks (including manway cover)?

Are there proper seals on sales and drain valves?

Are all suspected dump lines well supported?

Are above ground dump lines marked with t-posts and plastic covers?

Have all fiberglass drip pits been removed?

Yes Action N/A

Treaters/Separators/Compressors/Pump Jacks

If there is a block valve upstream of the relief valve, is the block valve secured in the open position?

Are relief valve discharge and blow downs piped to a safe area and secured against movement?

Has flame arrestor been inspected within the last 5 years?

Is flame port closed?

Do all lines pass through a super muffler or swirl pot to the pit/tank? If not, are all lines secured?

Is starting gas vented to a safe area, at least 10' vertically?

No excessive vibration, knocking or unusual noises anywhere on unit or piping?

Are site glasses in operating condition?

Are environmental rails piped to a pit in a dedicated line?

Do all blow downs, relief valve discharges, and risers have rain caps?

Stuffing box leaks are absent?

Are the weight guards and belt guard in place?

Are skids in good condition?

Are concrete bases / foundations in good condition?

Are concrete bases free from erosion or settlement problems?

Is secondary containment in place for day tanks?

Comments:

Signature of Inspector:

My signature assures that this location is SAFE, is in compliance with the LAW, and exhibits high standards of Pride, Ownership and Excellence.

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

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.
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.
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)

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.
5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
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)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2
Total BTEX	US EPA Method SW-846 8021B or 8260B	50
TPH	US EPA Method SW-846 418.1	100
Chlorides	US EPA Method 300.0 or 4500B	250 or background

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.

7. BP shall notify the division District III office of its results on form C-141.
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.
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.
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.
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

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.
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.
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.
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. Disposal Facility Name and Permit Number
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.