

District I
1625 A. 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 April 3, 2017

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company BP America Production Company	Contact Erin Garifalos
Address 200 Energy Court, Farmington, NM 87401	Telephone No. (832) 609-7048
Facility Name GCU 191	Facility Type: Natural Gas Well

Surface Owner: Federal	Mineral Owner: Federal	API No. 3004511590
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LOCATION OF RELEASE

Unit Letter P	Section 32	Township 28N	Range 12W	Feet from the 840	North/South Line South	Feet from the 840	East/West Line East	County San Juan
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Latitude 36.61321 Longitude -108.12915 NAD83

NATURE OF RELEASE

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

NMOCD
MAY 09 2018

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Sampling of the soil beneath the BGT was done during removal. Soil analysis resulted for Chlorides, BTEX, and TPH above BGT closure standards. The closure standard for this location is 100 mg/kg TPH and labs were 80 mg/kg TPH. Therefore no further action is necessary. Field reports and laboratory results are attached.

Describe Area Affected and Cleanup Action Taken.*
Final laboratory analysis attached, no further action necessary.

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.

OIL CONSERVATION DIVISION

Signature: <i>erin garifalos</i>	Approved by Environmental Specialist: <i>[Signature]</i>	
Printed Name: Erin Garifalos	Approval Date: <i>5/10/18</i>	Expiration Date:
Title: Field Environmental Coordinator	Conditions of Approval:	
E-mail Address: erin.garifalos@bp.com	Attached <input type="checkbox"/>	
Date: May 3, 2018	Phone: (832) 609-7048	

* Attach Additional Sheets If Necessary

#NCS 181 3033980

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CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004511590 TANK ID (if applicable): A
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FIELD REPORT:

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

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

SITE INFORMATION:

SITE NAME: **GCU # 191**

DATE STARTED: **03/08/18**

QUAD/UNIT: **P** SEC: **32** TWP: **28N** RNG: **12W** PM: **NM** CNTY: **SJ** ST: **NM**

DATE FINISHED:

1/4 -1/4/FOOTAGE: **840'S / 840'E** **SE/SE** LEASE TYPE: FEDERAL / STATE / FEE / INDIAN

ENVIRONMENTAL SPECIALIST(S): **NJV**

LEASE #: **SF079346** PROD. FORMATION: **DK** CONTRACTOR: **BP - J. GONZALES**

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: **36.61370 X 108.12877** GL ELEV.: **5,676'**

1) 95 BGT (DW/DB) - A	GPS COORD.: 36.61321 X 108.12915	DISTANCE/BEARING FROM W.H.: 209', S33.5W
2) _____	GPS COORD.: _____	DISTANCE/BEARING FROM W.H.: _____
3) _____	GPS COORD.: _____	DISTANCE/BEARING FROM W.H.: _____
4) _____	GPS COORD.: _____	DISTANCE/BEARING FROM W.H.: _____

SAMPLING DATA:

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: **HALL**

OVM READING (ppm)
2,500

1) SAMPLE ID: 5PC - TB @ 5' (95) - A	SAMPLE DATE: 03/08/18	SAMPLE TIME: 0930	LAB ANALYSIS: 8015B/8021B/300.0 (CI)	
2) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	
3) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	
4) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	
5) SAMPLE ID: _____	SAMPLE DATE: _____	SAMPLE TIME: _____	LAB ANALYSIS: _____	

SOIL DESCRIPTION:

SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER

SOIL COLOR: **MOSTLY DARK YELLOWISH ORANGE**

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE

DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

CONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSE

HC ODOR DETECTED: YES / NO EXPLANATION - **APPARENT VERY STRONG BENEATH**

MOISTURE: DRY / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED

BGT ONLY (NOT DISCOLORED).

SAMPLE TYPE: GRAB / COMPOSITE / # OF PTS. **5**

ANY AREAS DISPLAYING WETNESS: YES / NO EXPLANATION - _____

DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION - **BROWNISH BLACK AT OUTER PERIMETER OF BGT FOOTPRINT.**

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION - _____

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / NO EXPLANATION: **APPARENT HYDROCARBON ODOR, POSSIBLY BGT OVERFLOW(S)?**

EQUIPMENT SET OVER RECLAIMED AREA: YES / NO EXPLANATION - _____

OTHER: **NMOC D OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING.**

EXCAVATION DIMENSION ESTIMATION: **NA** ft. X **NA** ft. X **NA** ft. EXCAVATION ESTIMATION (Cubic Yards): **NA**

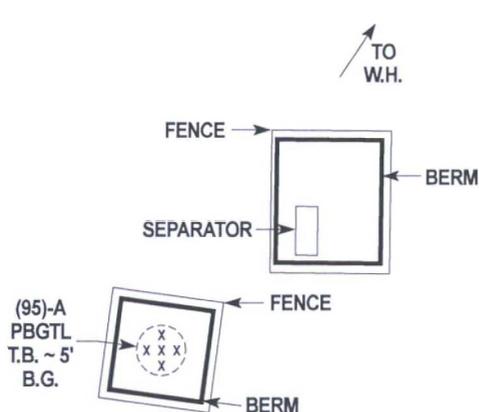
DEPTH TO GROUNDWATER: **<50'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **<1,000'** NMOC D TPH CLOSURE STD: **100** ppm

SITE SKETCH

BGT Located: off / on site

PLOT PLAN circle: attached

OVM CALIB. READ. = 100.0 ppm	RF = 1.00
OVM CALIB. GAS = 100 ppm	
TIME: 8:05 am/pm	DATE: 03/08/18



N

X - S.P.D.

MISCELL. NOTES

WO:	
REF #: P-941	
VID: VHIXONEVB2	
PJ #:	
Permit date(s): 06/14/10	
OCD Appr. date(s): 03/07/17	
Tank ID: A	OVM = Organic Vapor Meter ppm = parts per million
<input checked="" type="checkbox"/> BGT Sidewalls Visible: Y / <input checked="" type="checkbox"/> N	
<input type="checkbox"/> BGT Sidewalls Visible: Y / <input type="checkbox"/> N	
<input type="checkbox"/> BGT Sidewalls Visible: Y / <input type="checkbox"/> N	

Magnetic declination: **10° E**

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

NOTES: **GOOGLE EARTH IMAGERY DATE: 3/15/2015.** ONSITE: **03/08/18**

Analytical Report

Lab Order 1803520

Date Reported: 3/12/2018

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

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

Project: GCU 191

Collection Date: 3/8/2018 9:30:00 AM

Lab ID: 1803520-001

Matrix: SOIL

Received Date: 3/9/2018 7:35:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: CJS
Chloride	47	30		mg/Kg	20	3/9/2018 12:37:42 PM	36930
EPA METHOD 8015D MOD: GASOLINE RANGE							Analyst: AG
Gasoline Range Organics (GRO)	62	19		mg/Kg	5	3/9/2018 12:34:10 PM	G49679
Surr: BFB	131	70-130	S	%Rec	5	3/9/2018 12:34:10 PM	G49679
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	18	9.4		mg/Kg	1	3/9/2018 10:00:59 AM	36928
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	3/9/2018 10:00:59 AM	36928
Surr: DNOP	90.7	70-130		%Rec	1	3/9/2018 10:00:59 AM	36928
EPA METHOD 8260B: VOLATILES SHORT LIST							Analyst: AG
Benzene	ND	0.093		mg/Kg	5	3/9/2018 12:34:10 PM	R49679
Toluene	ND	0.19		mg/Kg	5	3/9/2018 12:34:10 PM	R49679
Ethylbenzene	ND	0.19		mg/Kg	5	3/9/2018 12:34:10 PM	R49679
Xylenes, Total	0.45	0.37		mg/Kg	5	3/9/2018 12:34:10 PM	R49679
Surr: 4-Bromofluorobenzene	123	70-130		%Rec	5	3/9/2018 12:34:10 PM	R49679
Surr: Toluene-d8	93.8	70-130		%Rec	5	3/9/2018 12:34:10 PM	R49679

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#: 1803520

12-Mar-18

Client: Blagg Engineering

Project: GCU 191

Sample ID	MB-36930	SampType:	mbk	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	36930	RunNo:	49678					
Prep Date:	3/9/2018	Analysis Date:	3/9/2018	SeqNo:	1606654	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-36930	SampType:	lcs	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	36930	RunNo:	49678					
Prep Date:	3/9/2018	Analysis Date:	3/9/2018	SeqNo:	1606655	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	96.8	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#: 1803520

12-Mar-18

Client: Blagg Engineering
Project: GCU 191

Sample ID	LCS-36928	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	36928	RunNo:	49663					
Prep Date:	3/9/2018	Analysis Date:	3/9/2018	SeqNo:	1605981	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	10	50.00	0	91.8	70	130			
Surr: DNOP	3.8		5.000		77.0	70	130			

Sample ID	MB-36928	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	36928	RunNo:	49663					
Prep Date:	3/9/2018	Analysis Date:	3/9/2018	SeqNo:	1605982	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	8.7		10.00		86.8	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#: 1803520

12-Mar-18

Client: Blagg Engineering

Project: GCU 191

Sample ID	100ng lcs	SampType:	LCS4	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	BatchQC	Batch ID:	R49679	RunNo:	49679					
Prep Date:		Analysis Date:	3/9/2018	SeqNo:	1606539	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.94	0.025	1.000	0	94.1	80	120			
Toluene	0.96	0.050	1.000	0	96.5	80	120			
Ethylbenzene	0.97	0.050	1.000	0	96.5	80	120			
Xylenes, Total	2.9	0.10	3.000	0	95.5	80	120			
Surr: 4-Bromofluorobenzene	0.46		0.5000		91.7	70	130			
Surr: Toluene-d8	0.47		0.5000		94.1	70	130			

Sample ID	rb	SampType:	MBLK	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	PBS	Batch ID:	R49679	RunNo:	49679					
Prep Date:		Analysis Date:	3/9/2018	SeqNo:	1606548	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	0.54		0.5000		108	70	130			
Surr: Toluene-d8	0.48		0.5000		96.0	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#: 1803520

12-Mar-18

Client: Blagg Engineering

Project: GCU 191

Sample ID	2.5UG GRO LCS	SampType:	LCS	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	LCSS	Batch ID:	G49679	RunNo:	49679					
Prep Date:		Analysis Date:	3/9/2018	SeqNo:	1606536	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	29	5.0	25.00	0	118	70	130			
Surr: BFB	540		500.0		108	70	130			

Sample ID	rb	SampType:	MBLK	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	PBS	Batch ID:	G49679	RunNo:	49679					
Prep Date:		Analysis Date:	3/9/2018	SeqNo:	1606537	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	580		500.0		116	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 |



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: 1803520

RcptNo: 1

Received By: **Anne Thorne** 3/9/2018 7:35:00 AM
 Completed By: **Anne Thorne** 3/9/2018 8:13:48 AM
 Reviewed By: **ENM** 3/9/18

Anne Thorne
Anne Thorne

Chain of Custody

1. Is Chain of Custody complete? Yes No Not Present
 2. How was the sample delivered? Courier

Log In

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

of preserved bottles checked for pH: _____ (<2 or >12 unless noted) Adjusted? _____ Checked by: _____
--

Special Handling (if applicable)

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

Person Notified: _____	Date: _____
By Whom: _____	Via: <input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding: _____	
Client Instructions: _____	

16. Additional remarks:

17. Cooler Information

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

o.k. ch...

