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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: BP America Production Co.	Contact: Steve Moskal
Address: 380 Airport Rd., Durango, CO 81303	Telephone No.: 505-330-9179
Facility Name: PRITCHARD SWD No. 001	Facility Type: Salt Water Disposal Well

Surface Owner: Federal	Mineral Owner: Federal	API No. 30045283~~15~~ 51

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County: San Juan
C	34	31N	09W	615	North	1,840	West	

Latitude 36.85995° **Longitude** -107.77052°

NATURE OF RELEASE

Type of Release: produced water, oil	Volume of Release: 16 bbl	Volume Recovered: none
Source of Release: BGT due to packing leak on injection pump	Date and Hour of Occurrence: July 16, 2017	Date and Hour of Discovery: July 16, 2017; 12:18PM
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.*
~350' from nearest water course.

Describe Cause of Problem and Remedial Action Packing leak occurred on injection pump #1 causing BGT to fill up and run over into cellar. SSS dispatched to pull fluids, pump isolated on suction and discharge to limit amount continuing to be released. Repair piping.

Describe Area Affected and Cleanup Action Taken.* packing leak occurred on injection pump #1 causing BGT to fill up and run over into cellar. SSS dispatched to pull fluids, pump isolated on suction and discharge to limit amount continuing to be released. Contained to steel secondary containment. Sampling results and field report are attached. The impacts were remediated via excavation. Attached is a field report documenting the activities. BP requests no further action.

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: Steve Moskal	Approved by Environmental Specialist:	
Title: Field Environmental Coordinator	Approval Date: 7/3/2018	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval: —	Attached ☐
Date: June 21, 2018 Phone: 505-330-9179		

* Attach Additional Sheets If Necessary

nCS1723537128

13

BP America
Pritchard SWD 1
(C) Sec 34 – T31N – R9W
San Juan County, New Mexico
API: 30-045-28351

Summary Record of Impact Remediation

July 16, 2017 Loss of approximately 16 barrels produced water entered and overflowed at 95 barrel BGT.

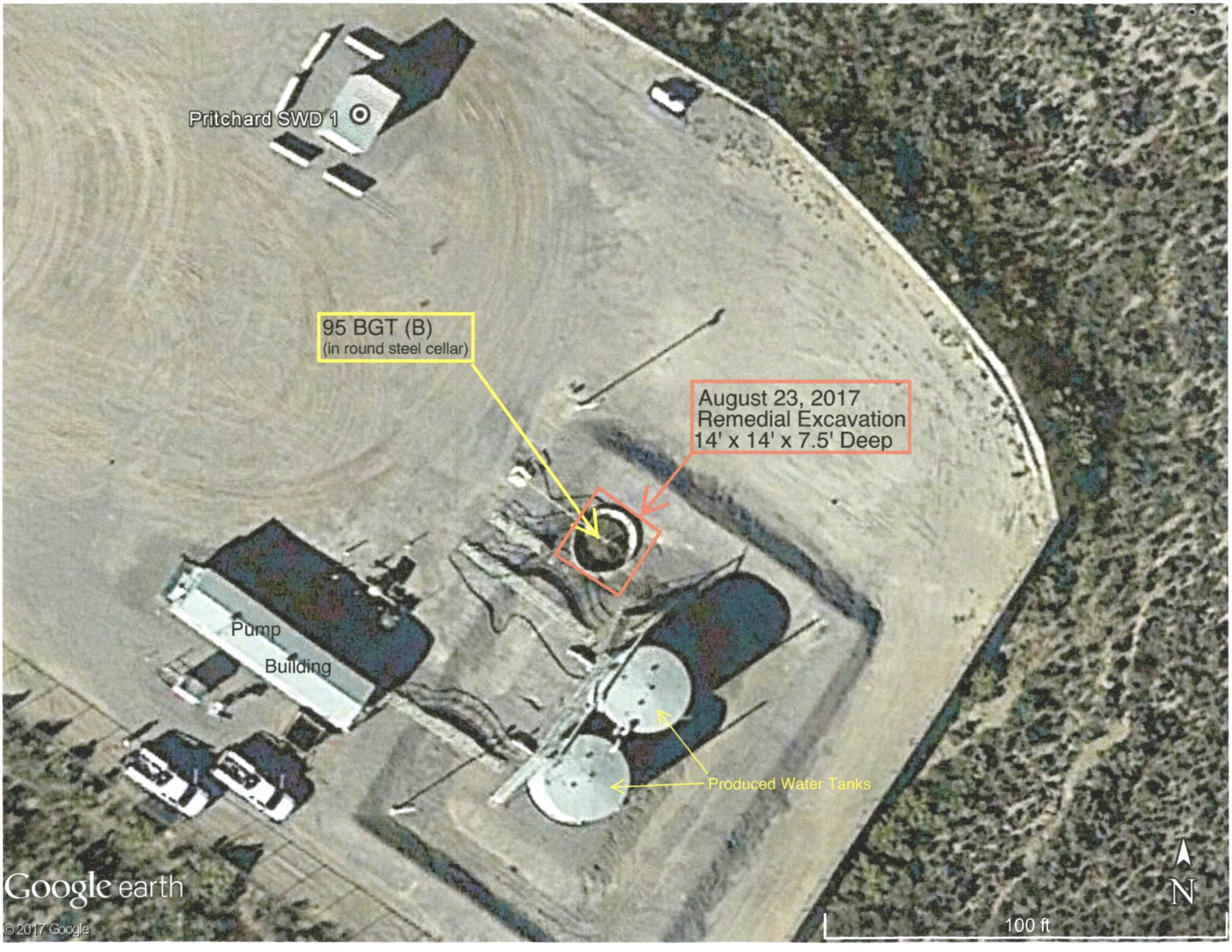
July 18, 2017 Initial site sampling. A 5-point composite soil sample collected at 12-inches below grade tested TPH at 810 mg/Kg, BTEX at non-detect and chlorides at 130 ppm. Lab results submitted to NMOCD via email. Release reported to NMOCD on form C-141. Authorization granted to proceed with remediation via excavation.

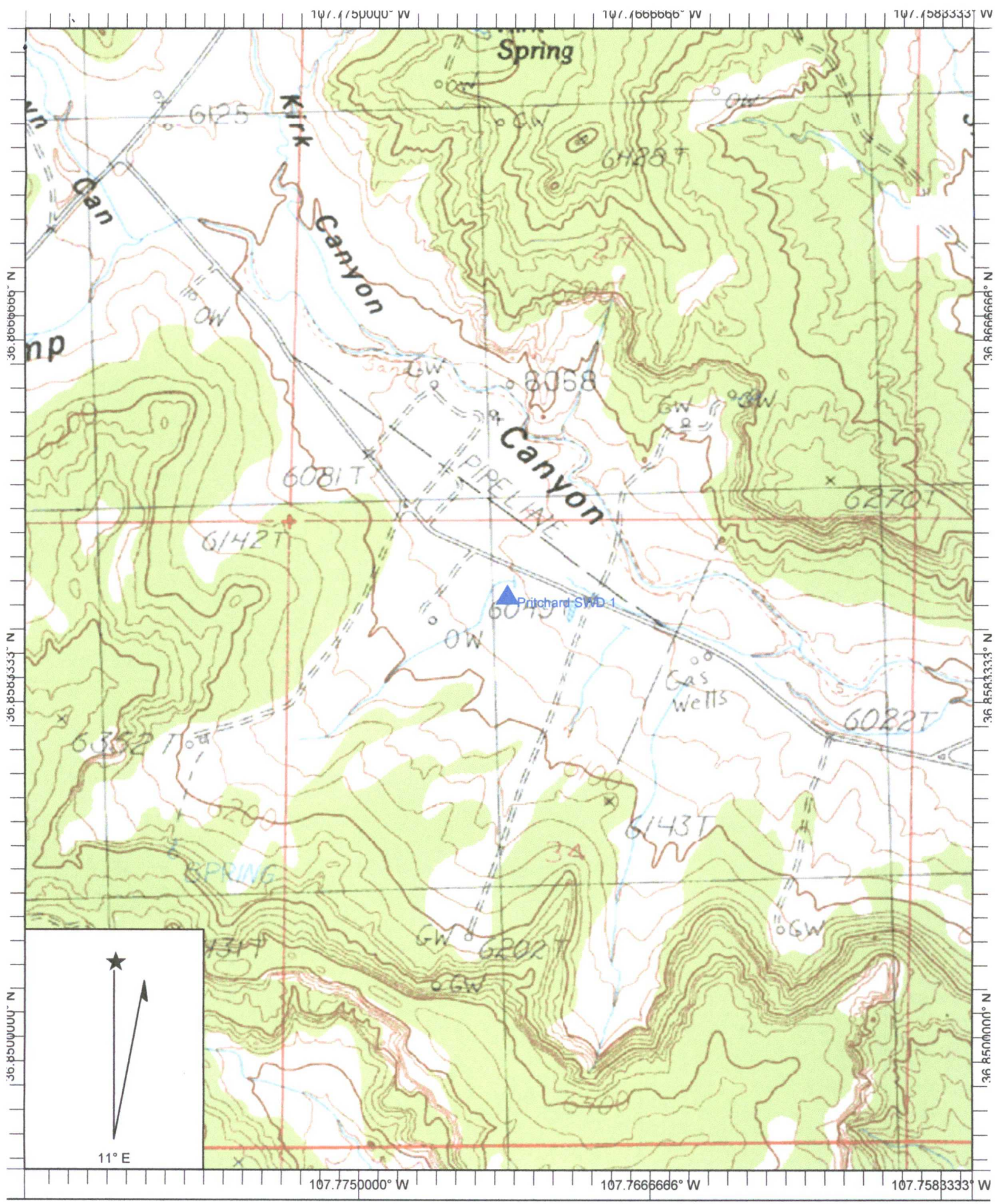
Site NMOCD/BLM closure standard determined at 100 ppm TPH based on:

Horizontal Distance to Dry Wash < 200 feet (20 points)
Nearest Water Well > 1,000 feet (0 points)
Depth to Groundwater > 50 feet (10 points)

August 23, 2017 Conduct site remediation via excavation. Final excavation size approximately 14' x 14' x 7.5' average depth. Collect 5-point composite base sample and 4-point sidewall sample (at 4' depth) for laboratory analysis. Both samples reported non-detect for TPH and BTEX. Chlorides tested at 38 ppm and 130 ppm respectively.

August 25, 2017 Complete backfilling operations.


Pritchard SWD 1
95 BGT (B)
(in round steel cellar)
August 23, 2017
Remedial Excavation
14' x 14' x 7.5' Deep
Pump
Building
Produced Water Tanks
Google earth
© 2017 Google
N
100 ft



Name: TURLEY
Date: 7/24/2017
Scale: 1 inch equals 1000 feet

Location: 036.8601606° N 107.7710175° W
Caption: BP
Pritchard SWD 1

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

August 27, 2017

Steve Moskal

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

RE: Pritchard SWD 1 OrderNo.: 1708D71

Dear Steve Moskal:

Hall Environmental Analysis Laboratory received 2 sample(s) on 8/24/2017 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,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1708D71**
Date Reported: **8/27/2017**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
Project: Pritchard SWD 1
Lab ID: 1708D71-001
Matrix: MEOH (SOIL)
Client Sample ID: 95 BGT Spill 5-pt @ 7.5'
Collection Date: 8/23/2017 2:57:00 PM
Received Date: 8/24/2017 6:15:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS						Analyst: **MRA**	
Chloride	38	30		mg/Kg	20	8/24/2017 11:59:56 AM	33539
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **TOM**	
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	8/24/2017 9:48:05 AM	33533
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	8/24/2017 9:48:05 AM	33533
Surr: DNOP	95.3	70-130		%Rec	1	8/24/2017 9:48:05 AM	33533
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**	
Gasoline Range Organics (GRO)	ND	3.4		mg/Kg	1	8/24/2017 9:39:55 AM	33513
Surr: BFB	89.5	54-150		%Rec	1	8/24/2017 9:39:55 AM	33513
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**	
Benzene	ND	0.017		mg/Kg	1	8/24/2017 9:39:55 AM	33513
Toluene	ND	0.034		mg/Kg	1	8/24/2017 9:39:55 AM	33513
Ethylbenzene	ND	0.034		mg/Kg	1	8/24/2017 9:39:55 AM	33513
Xylenes, Total	ND	0.069		mg/Kg	1	8/24/2017 9:39:55 AM	33513
Surr: 4-Bromofluorobenzene	99.1	66.6-132		%Rec	1	8/24/2017 9:39:55 AM	33513

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 Quanitative 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.

CLIENT: Blagg Engineering
Project: Pritchard SWD 1
Lab ID: 1708D71-002 **Matrix:** MEOH (SOIL)

Client Sample ID: 95 BGT Spill 4-pt Wall @ 4'
Collection Date: 8/23/2017 3:05:00 PM
Received Date: 8/24/2017 6:15:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS						Analyst: **MRA**	
Chloride	130	30		mg/Kg	20	8/24/2017 12:12:21 PM	33539
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **TOM**	
Diesel Range Organics (DRO)	ND	9.4		mg/Kg	1	8/24/2017 10:15:50 AM	33533
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	8/24/2017 10:15:50 AM	33533
Surr: DNOP	95.6	70-130		%Rec	1	8/24/2017 10:15:50 AM	33533
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**	
Gasoline Range Organics (GRO)	ND	4.0		mg/Kg	1	8/24/2017 10:03:32 AM	33513
Surr: BFB	89.6	54-150		%Rec	1	8/24/2017 10:03:32 AM	33513
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**	
Benzene	ND	0.020		mg/Kg	1	8/24/2017 10:03:32 AM	33513
Toluene	ND	0.040		mg/Kg	1	8/24/2017 10:03:32 AM	33513
Ethylbenzene	ND	0.040		mg/Kg	1	8/24/2017 10:03:32 AM	33513
Xylenes, Total	ND	0.080		mg/Kg	1	8/24/2017 10:03:32 AM	33513
Surr: 4-Bromofluorobenzene	98.8	66.6-132		%Rec	1	8/24/2017 10:03:32 AM	33513

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 Quanitative 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#: **1708D71**

27-Aug-17

Client: Blagg Engineering
Project: Pritchard SWD 1

Sample ID	**MB-33539**	SampType:	**mblk**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**PBS**	Batch ID:	**33539**		RunNo:	**45189**				
Prep Date:	**8/24/2017**	Analysis Date:	**8/24/2017**		SeqNo:	**1432108**	Units:	**mg/Kg**		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-33539**	SampType:	**lcs**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**LCSS**	Batch ID:	**33539**		RunNo:	**45189**				
Prep Date:	**8/24/2017**	Analysis Date:	**8/24/2017**		SeqNo:	**1432109**	Units:	**mg/Kg**		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.3	90	110			

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 Quanitative 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#: **1708D71**

27-Aug-17

Client: Blagg Engineering
Project: Pritchard SWD 1

Sample ID **LCS-33533**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **33533**	RunNo: **45181**
Prep Date: **8/24/2017**	Analysis Date: **8/24/2017**	SeqNo: **1430495** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	95.1	73.2	114			
Surr: DNOP	4.6		5.000		93.0	70	130			

Sample ID **MB-33533**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **33533**	RunNo: **45181**
Prep Date: **8/24/2017**	Analysis Date: **8/24/2017**	SeqNo: **1430496** 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	9.9		10.00		99.1	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 Quanitative 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#: **1708D71**

27-Aug-17

Client: Blagg Engineering
Project: Pritchard SWD 1

Sample ID **MB-33513**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **PBS**	Batch ID: **33513**	RunNo: **45186**
Prep Date: **8/23/2017**	Analysis Date: **8/24/2017**	SeqNo: **1431549** 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	900		1000		89.5	54	150			

Sample ID **LCS-33513**	SampType: **LCS**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **LCSS**	Batch ID: **33513**	RunNo: **45186**
Prep Date: **8/23/2017**	Analysis Date: **8/24/2017**	SeqNo: **1431550** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	90.8	76.4	125			
Surr: BFB	970		1000		97.0	54	150			

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 Quanitative 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#: **1708D71**

27-Aug-17

Client: Blagg Engineering
Project: Pritchard SWD 1

Sample ID **MB-33513**	SampType: **MBLK**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **PBS**	Batch ID: **33513**	RunNo: **45186**
Prep Date: **8/23/2017**	Analysis Date: **8/24/2017**	SeqNo: **1431581** 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	1.0		1.000		100	66.6	132			

Sample ID **LCS-33513**	SampType: **LCS**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **LCSS**	Batch ID: **33513**	RunNo: **45186**
Prep Date: **8/23/2017**	Analysis Date: **8/24/2017**	SeqNo: **1431582** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.90	0.025	1.000	0	90.4	80	120			
Toluene	0.91	0.050	1.000	0	91.4	80	120			
Ethylbenzene	0.93	0.050	1.000	0	93.0	80	120			
Xylenes, Total	2.8	0.10	3.000	0	94.1	80	120			
Surr: 4-Bromofluorobenzene	1.0		1.000		103	66.6	132			

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 Quanitative 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

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: 1708D71 RcptNo: 1

Received By: Ashley Gallegos 8/24/2017 6:15:00 AM AG
Completed By: Ashley Gallegos 8/24/2017 6:47:18 AM AG
Reviewed By: ENM 8/24/17

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° 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 ☐	# of preserved bottles checked for pH: ____ (<2 or >12 unless noted)
13. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	Adjusted? ____
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 ☐	Checked by: ____

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: ____ Date: ____
By Whom: ____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding: ____
Client Instructions: ____

17. Additional remarks:

18. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.1	Good	Yes			

Chain-of-Custody Record

Client: BP America

Blagg Engineering

Mailing Address:

Phone #: 505 320 1193

email or Fax#:

QA/QC Package:
☒ Standard ☐ Level 4 (Full Validation)

Accreditation
☐ NELAP ☐ Other

☐ EDD (Type)

Turn-Around Time: SAME DAY
☐ Standard ☒ Rush

Project Name: PRITCHARD SWD #1

Project #:

Project Manager: Steve Moskal

Sampler: Jeff Blagg
On Ice: ☒ Yes ☐ No
Sample Temperature: 1.1

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1708D71	BTEX + ~~MTBE + TMB~~'s (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride				Air Bubbles (Y or N)
8/23/17	1457	SOIL	95 BBT SPILL S-pt @ 7½'	4oz x1	COOL	-001	X		X									X				
"	1505	"	95 BBT SPILL 4-pt wall @ 4'	"	"	-002	X		X									X				

Date:	Time:	Relinquished by:	Received by:	Date	Time
8/23/17	1609			8/23/17	1609
Date:	Time:	Relinquished by:	Received by:	Date	Time
8/23/17	1934			08/24/17	0615

Remarks: Bill BP Contact: Steve Moskal
VOC: VHIXOMEVRM

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.