

District I  
25 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

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

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

|  |                                     |
|--|-------------------------------------|
| Name of Company <b>BP America Production Company</b> | Contact <b>Brittany Benko</b>       |
| Address <b>200 Energy Court Farmington, NM 87401</b> | Telephone No. <b>(505) 326-9235</b> |
| Facility Name <b>Lindsey A LS 1B</b>                 | Facility Type <b>Wellsite</b>       |

|                          |                          |  |
|--------------------------|--------------------------|--|
| Surface Owner <b>BLM</b> | Mineral Owner <b>BLM</b> | Lease No.<br><b>30-045-31899</b><br><b>SF - 079511-A</b> |
|--------------------------|--------------------------|--|

LOCATION OF RELEASE

|                         |                      |                        |                    |                             |                                |                              |                              |                                  |
|-------------------------|----------------------|------------------------|--------------------|-----------------------------|--------------------------------|------------------------------|------------------------------|----------------------------------|
| Unit Letter<br><b>B</b> | Section<br><b>19</b> | Township<br><b>30N</b> | Range<br><b>8W</b> | Feet from the<br><b>730</b> | North/South Line<br><b>FNL</b> | Feet from the<br><b>1535</b> | East/West Line<br><b>FEL</b> | County<br><b>San Juan County</b> |
|-------------------------|----------------------|------------------------|--------------------|-----------------------------|--------------------------------|------------------------------|------------------------------|----------------------------------|

NATURE OF RELEASE

|  |  |   |
|--|--|---|
| Type of Release <b>Packer Fluid</b>  | Volume of Release <b>40 bbls</b>                                 | Volume Recovered <b>0 bbls</b>                                  |
| Source of Release <b>Tanker Truck</b>  | Date and Hour of Occurrence<br><b>February 10, 2004 10:30 AM</b> | Date and Hour of Discovery<br><b>February 10, 2004 10:30 AM</b> |
| Was Immediate Notice Given?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom?<br><b>Denny Foust</b>                           |   |
| By Whom? <b>Brittany Benko</b>   | Date and Hour <b>02/11/2004 10:15 AM</b>                         |   |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  | If YES, Volume Impacting the Watercourse.                        |   |

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

**Thirty gallons of packer fluid was spilled at the Lindsey LS 1B location. Using the tanker truck that still contained 40 barrels of packer fluid (excess fluid mixed and not used in the intended job), contractor recovered 15 gallons of the spilled fluid. Prior to the disposal of the fluid (40 bbl excess plus recovered fluid), a sample and analysis was required to manage this fluid for proper disposal. However, before the analysis was concluded and the fluid disposed of properly, Triple S and Schlumberger through a series of miscommunications off-loaded the packer fluid into the lined reserve pit on the well location.**

Describe Area Affected and Cleanup Action Taken.\*

**Isolated the fluid now in the location lined reserve pit. An incident investigation was commissioned. Analysis was completed on the fluid prior to its disposal in the reserve pit and all analysis showed the fluid to be non-hazardous. Upon consultation with both the NMOCD and BLM, it was determined that the reserve pit fluid should remain on location in the lined reserve pit - evaporated and the reserve pit closed per standard closure procedures.**

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: <i>Brittany D Benko</i>      | OIL CONSERVATION DIVISION  |   |
| Printed Name: <b>Brittany D Benko</b>   | Approved by District Supervisor: <i>Denny Foust</i><br><i>For Frank Chavez</i> |   |
| Title: <b>Environmental Coordinator</b> | Approval Date: <i>2/23/04</i>  | Expiration Date:  |
| Date: <b>02/16/2004</b>                 | Phone: <b>(505) 326-9235</b>   | Conditions of Approval: Attached <input type="checkbox"/> |

\* Attach Additional Sheets If Necessary

*106F0404353232*

*4*

# ENVIROTECH LABS

Practical Solutions for a Better Tomorrow

## SUSPECTED HAZARDOUS WASTE ANALYSIS

|                |                 |                   |           |
|----------------|-----------------|-------------------|-----------|
| Client:        | Blagg / BP      | Project #:        | 94034-010 |
| Sample ID:     | Surface Fluid   | Date Reported:    | 02-11-04  |
| Lab ID#:       | 27821           | Date Sampled:     | 02-09-04  |
| Sample Matrix: | Fluid           | Date Received:    | 02-10-04  |
| Preservative:  | Cool            | Date Analyzed:    | 02-11-04  |
| Condition:     | Cool and Intact | Chain of Custody: | 11835     |

| Parameter | Result |
|-----------|--------|
|-----------|--------|

**IGNITABILITY:** Negative

**CORROSIVITY:** Negative pH = 7.63

**REACTIVITY:** Negative

### RCRA Hazardous Waste Criteria

| Parameter | Hazardous Waste Criterion |
|-----------|---------------------------|
|-----------|---------------------------|

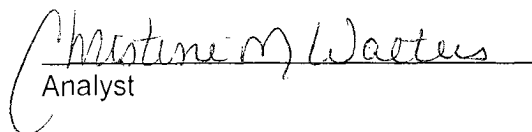
|               |   |
|---------------|---|
| IGNITABILITY: | Characteristic of Ignitability as defined by 40 CFR, Subpart C, Sec. 261.21.<br>(i.e. Sample ignition upon direct contact with flame or flash point < 60° C.) |
|---------------|---|

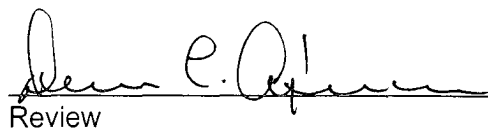
|              |  |
|--------------|--|
| CORROSIVITY: | Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22.<br>(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5) |
|--------------|--|

|             |   |
|-------------|---|
| REACTIVITY: | Characteristic of Reactivity as defined by 40 CFR, Subpart C, Sec. 261.23.<br>(i.e. Violent reaction with water, strong base, strong acid, or the generation of Sulfide or Cyanide gases at STP with pH between 2.0 and 12.5) |
|-------------|---|

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: Lindsay A LS 1B Spill.

  
Analyst

  
Review

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## TRACE METAL ANALYSIS

|                    |               |                  |             |
|--------------------|---------------|------------------|-------------|
| Client:            | Blagg / BP    | Project #:       | 94034-010   |
| Sample ID:         | Surface Fluid | Date Reported:   | 02-12-04    |
| Laboratory Number: | 27821         | Date Sampled:    | 02-09-04    |
| Chain of Custody:  | 11835         | Date Received:   | 02-10-04    |
| Sample Matrix:     | Fluid         | Date Analyzed:   | 02-12-04    |
| Preservative:      | Cool          | Date Digested:   | 02-11-04    |
| Condition:         | Cool & Intact | Analysis Needed: | RCRA Metals |

| Parameter | Concentration<br>(mg/L) | Det.<br>Limit<br>(mg/L) | TCLP Regulatory<br>Level<br>(mg/L) |
|-----------|-------------------------|-------------------------|------------------------------------|
| Arsenic   | ND                      | 0.001                   | 5.0                                |
| Barium    | 0.016                   | 0.001                   | 100                                |
| Cadmium   | ND                      | 0.001                   | 1.0                                |
| Chromium  | 0.001                   | 0.001                   | 5.0                                |
| Lead      | 0.001                   | 0.001                   | 5.0                                |
| Mercury   | ND                      | 0.001                   | 0.2                                |
| Selenium  | ND                      | 0.001                   | 1.0                                |
| Silver    | ND                      | 0.001                   | 5.0                                |

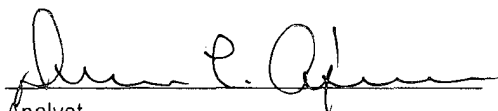
ND - Parameter not detected at the stated detection limit.

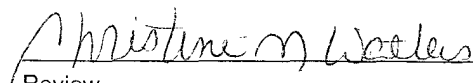
References: Method 3050B, Acid Digestion of Sediments, Sludges and Soils.  
SW-846, USEPA, December 1996.

Method 6010B, Analysis of Metals by Inductively Coupled Plasma Atomic Emission Spectroscopy, SW-846, USEPA, December 1996.

Note: Regulatory Limits based on 40 CFR part 261 subpart C  
section 261.24, August 24, 1998.

Comments: **Lindsay A LS 1B Spill.**

  
Analyst

  
Review

|                    |               |                  |             |
|--------------------|---------------|------------------|-------------|
| Client:            | Blagg / BP    | Project #:       | 94034-010   |
| Sample ID:         | Surface Soil  | Date Reported:   | 02-12-04    |
| Laboratory Number: | 27822         | Date Sampled:    | 02-09-04    |
| Chain of Custody:  | 11835         | Date Received:   | 02-10-04    |
| Sample Matrix:     | Soil          | Date Analyzed:   | 02-12-04    |
| Preservative:      | Cool          | Date Digested:   | 02-11-04    |
| Condition:         | Cool & Intact | Analysis Needed: | RCRA Metals |

| Parameter | Concentration<br>(mg/Kg) | Det.<br>Limit<br>(mg/Kg) | TCLP Regulatory<br>Level<br>(mg/Kg) |
|-----------|--------------------------|--------------------------|-------------------------------------|
| Arsenic   | 0.004                    | 0.001                    | 5.0                                 |
| Barium    | 0.093                    | 0.001                    | 100                                 |
| Cadmium   | ND                       | 0.001                    | 1.0                                 |
| Chromium  | 0.003                    | 0.001                    | 5.0                                 |
| Lead      | 0.002                    | 0.001                    | 5.0                                 |
| Mercury   | ND                       | 0.001                    | 0.2                                 |
| Selenium  | 0.002                    | 0.001                    | 1.0                                 |
| Silver    | ND                       | 0.001                    | 5.0                                 |

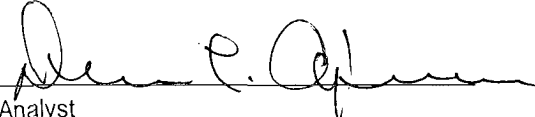
ND - Parameter not detected at the stated detection limit.

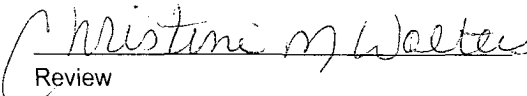
References: Method 3050B, Acid Digestion of Sediments, Sludges and Soils.  
SW-846, USEPA, December 1996.

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