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 Department

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party **SIMCOE LLC** (BP as contractor)	OGRID **329736**
Contact Name **Steve Moskal**	Contact Telephone **(505) 330-9179**
Contact email **Steven.Moskal@bpx.com**	Incident # *(assigned by OCD)* **NVF1802648183**
Contact mailing address **1199 Main Ave., Suite 101, Durango, CO 81301**	

Location of Release Source

Latitude **36.952609** Longitude **-107.881083**
(NAD 83 in decimal degrees to 5 decimal places)

Site Name **Holmberg Gas Com 001A**	Site Type **Natural Gas Well**
Date Release Discovered **January 15, 2018**	API# *(if applicable)* **3004522631**

Unit Letter	Section	Township	Range	County
P	**28**	**32N**	**10W**	**San Juan**

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (*Name:* _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☒ Condensate	Volume Released (bbls) **4.0**	Volume Recovered (bbls) **1.5**
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **During the sale of condensate from the aboveground storage tank to the third party purchaser, Pacer Midstream, a mechanical failure occurred on the transport truck. The failure of a vacuum hose resulted in the release of 4.0 bbls of oil. The volume released is based on gauging info collected during the sale of the product. The truck was immediately stopped and sent for repairs.**

The impacts measure approximately 80 ft. L x 12 ft. W x 4.5-1.5 ft. D. A vac truck was employed to suck up the free standing fluid. The impacted soil was then excavated and transported off site for landfarm treatment. Approximately 140 cubic yards were removed.

The closure of this release adheres to 19.15.29 NMAC. No further action is requested.

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Page 2

State of New Mexico
Oil Conservation Division

Incident ID	
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Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Not required.

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☒ The source of the release has been stopped.
☒ The impacted area has been secured to protect human health and the environment.
☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: Steve.Moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release? **Based on Animas River nearest point's surface elevation relative to well site**	15-25 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse? **Aerial Map 1 & Figure 2**	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)? **Aerial Map 1 & Figure 2**	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church? **Figure 3**	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes? **Figure 1 & Figure 4**	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring? **Figure 1 & Figure 4**	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field? **Figure 5**	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland? **Figure 6**	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine? **Figure 7**	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain? **Figure 8**	☒ Yes ☐ No
Did the release impact areas **not** on an exploration, development, production, or storage site? **Aerial Map 2**	☐ Yes ☒ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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Page 4

State of New Mexico
Oil Conservation Division

Incident ID	
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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: Steve.Moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

☐ Extents of contamination must be fully delineated.

☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: Steve.Moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: ***Each of the following items must be included in the closure report.***

☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☒ Description of remediation activities **Via vac truck & excavation.**

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: Date: 11/23/2020

email: Steve.Moskal@bpx.com Telephone: (505) 330-9179

OCD Only

Received by: OCD Date: 07/29/2022

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Ashley Maxwell Date: 09/13/2022

Printed Name: Ashley Maxwell Title: Environmental Specialist

AUGUST 3, 2020

SAMPLING EVENT

SIMCOE LLC

In case of emergency, please call:

505-947-9900

SIMCOE LLC

HOLMBERG GAS COM 001A

API 3004522631 LEASE FEE

1165 FSL 810 FEL (P) SEC 28 T32N R10W

SAN JUAN COUNTY ELEV 5873

LAT 36° 57' 8.424"

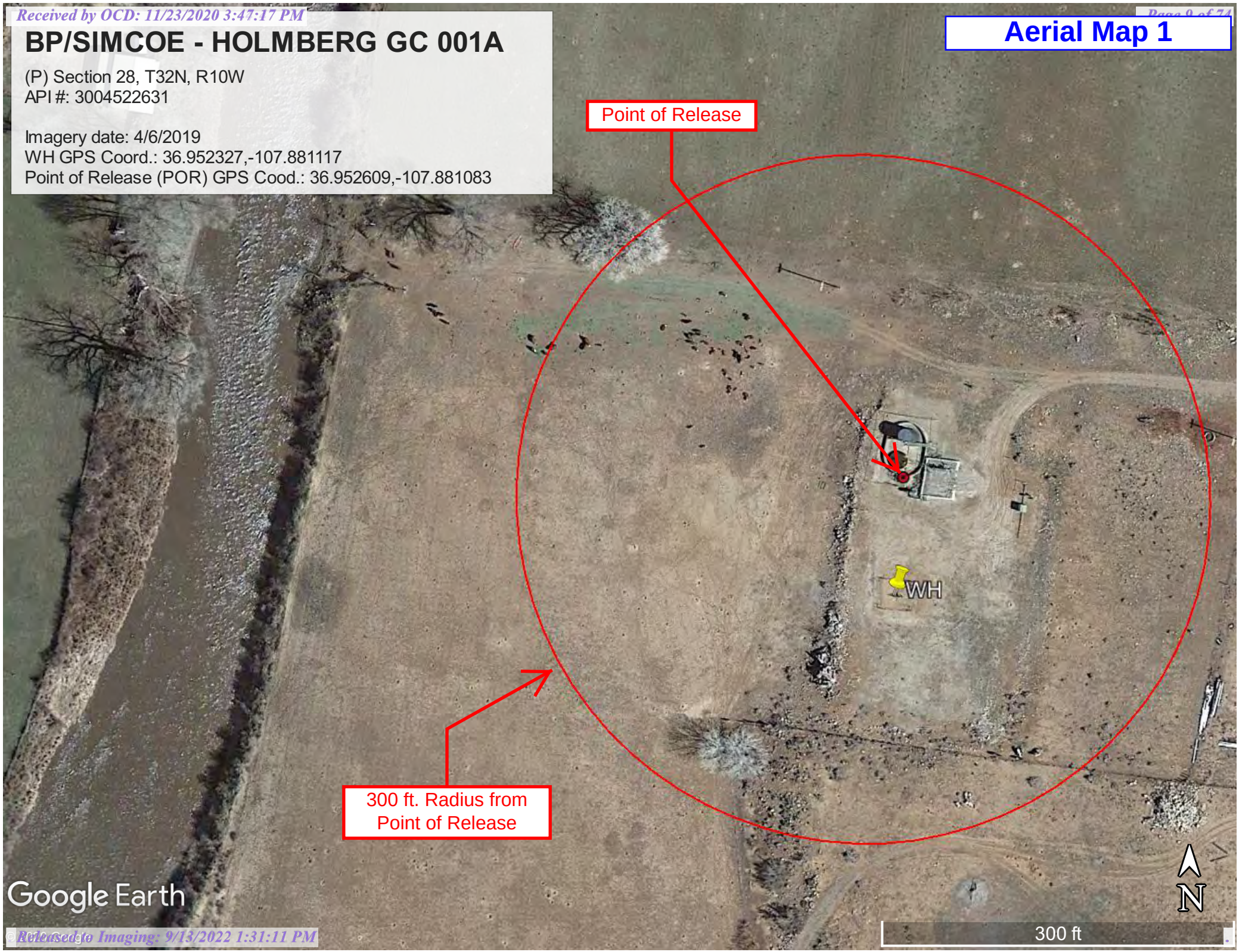
LONG 107°52' 51.564"

BP/SIMCOE - HOLMBERG GC 001A

(P) Section 28, T32N, R10W
API #: 3004522631

Imagery date: 4/6/2019
WH GPS Coord.: 36.952327,-107.881117
Point of Release (POR) GPS Cood.: 36.952609,-107.881083

Aerial Map 1

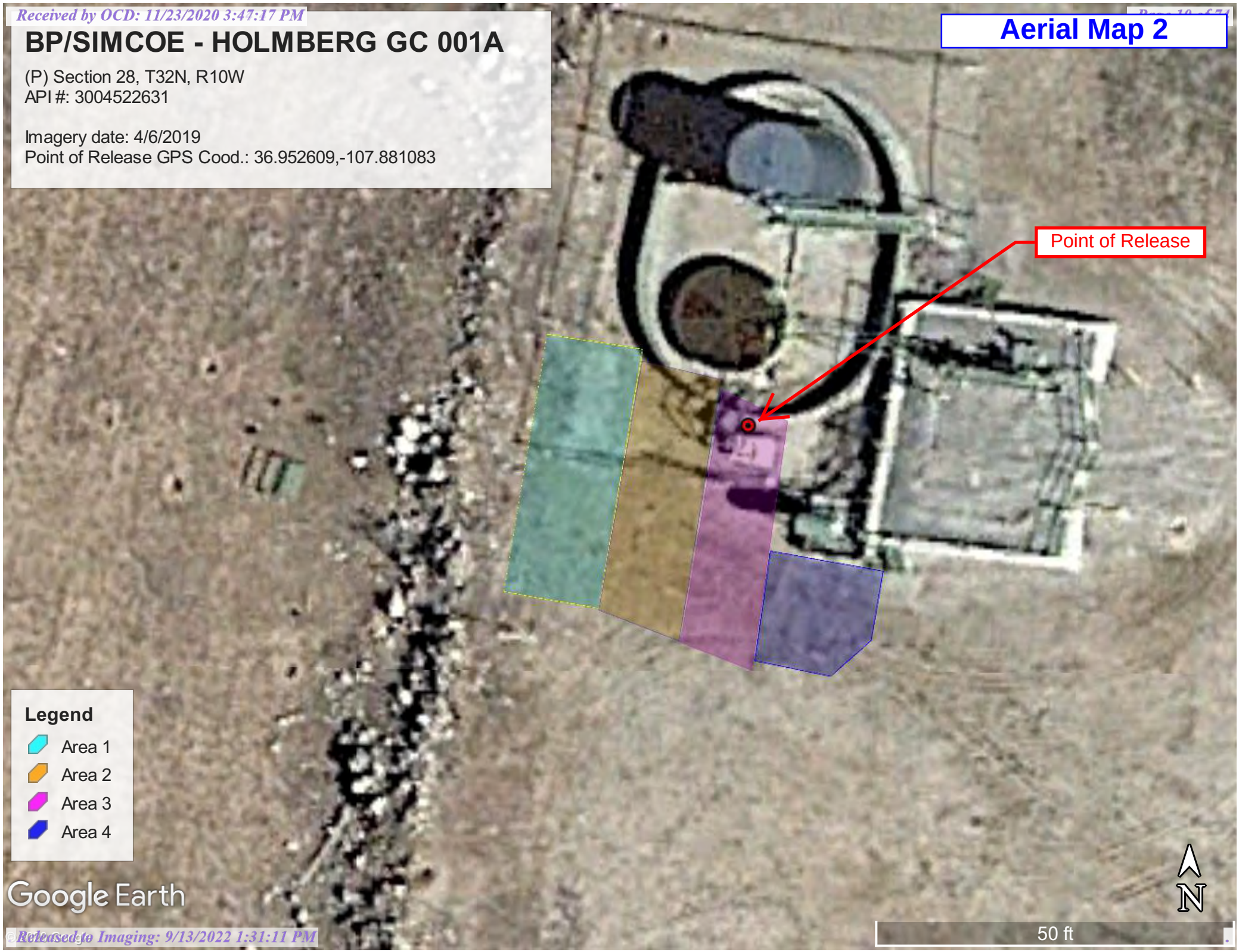


BP/SIMCOE - HOLMBERG GC 001A

(P) Section 28, T32N, R10W
API #: 3004522631

Imagery date: 4/6/2019
Point of Release GPS Cood.: 36.952609,-107.881083

Aerial Map 2



CLIENT: **BP/SIMCOE**

BLAGG ENGINEERING, INC.
P.O. BOX 87, BLOOMFIELD, NM 87413
(505) 632-1199

API #: **3004522631**
TANK ID (if applicble): **NA**

FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / [OTHER:]
REMEDIATION CONFIRMATION

PAGE #: **1** of **2**

SITE INFORMATION:

SITE NAME: **HOLMBERG GC # 1A**

QUAD/UNIT: **P** SEC: **28** TWP: **32N** RNG: **10W** PM: **NM** CNTY: **SJ** ST: **NM**

1/4 -1/4/FOOTAGE: **1,165'S / 810'E** **SE/SE** LEASE TYPE: FEDERAL / STATE / [FEE] / INDIAN

LEASE #: **-** PROD. FORMATION: **MV** CONTRACTOR: **KELLEY O.F.S. BP/SIMCOE - D. BULLER**

DATE STARTED: **08/03/20**
DATE FINISHED:
ENVIRONMENTAL SPECIALIST(S): **JCB**

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: **36.952327 X 107.881117** GL ELEV.: **5,873'**

		GPS COORD.	DISTANCE/BEARING FROM P&A
1)	**POINT OF RELEASE (POR)**	**36.952609 X 107.881083**	**103', N5E**
2)			
3)			
4)			

SAMPLING DATA:

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

	SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	OVM READING (ppm)
1)	**AREA 1 5-point (2' - 4.5')**	**08/03/20**	**0917**	**8015B / 8021B / 300.0**	**0.0**
2)	**AREA 2 5-point (2' - 4.5')**	**08/03/20**	**0944**	**8015B / 8021B / 300.0**	**0.0**
3)	**AREA 3 5-point (2' - 4.5')**	**08/03/20**	**1012**	**8015B / 8021B / 300.0**	**1.6**
4)	**AREA 4 5-point (2' - 4.5')**	**08/03/20**	**1032**	**8015B / 8021B / 300.0**	**2.4**
5)					

SOIL DESCRIPTION:

SOIL TYPE: [SAND] / SILTY SAND / SILT / SILTY CLAY / CLAY / [GRAVEL] / OTHER **LARGE RIVER COBBLES**

SOIL COLOR: **DARK YELLOWISH BROWN**

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

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

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

SAMPLE TYPE: GRAB / [COMPOSITE] - # OF PTS.

DISCOLORATION/STAINING OBSERVED: YES / [NO] EXPLANATION -

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

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

HC ODOR DETECTED: YES / [NO] EXPLANATION -

ANY AREAS DISPLAYING WETNESS: YES / [NO] EXPLANATION -

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION - **OIL HAULING TRUCK HOSE FAILURE IN JAN. 2018**

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED : [YES] NO EXPLANATION:

EQUIPMENT SET OVER RECLAIMED AREA: YES / [NO] EXPLANATION -

OTHER: **NMOCD REP. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. ALL SAMPLES COLLECTED OF NATIVE SOILS USING BACKHEO. PRIOR REMEDIATION BACKFILLED WITH APPARENT SAND/GRAVEL MIX. NATIVE MATERIAL AT 4 FT. DEPTH CONSISTED OF LARGE RIVER ROCKS.**

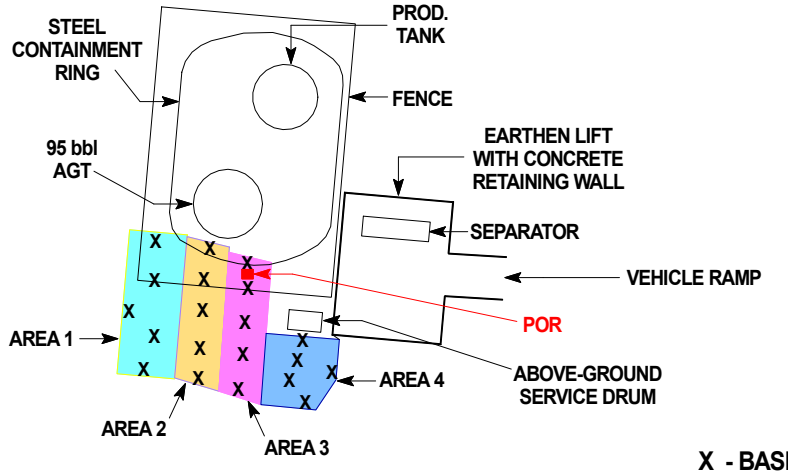
EXCAVATION DIMENSION ESTIMATION: **NA** ft. X **NA** ft. X **NA** ft. EXCAVATION ESTIMATION (Cubic Yards) : **NA**

DEPTH TO GROUNDWATER: **<50'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **300'<x<1,000'** NMOCD TPH CLOSURE STD: **100** ppm

SITE SKETCH

BGT Located : off / on site

PLOT PLAN circle: attached



X - BASE S.P.D.

OVM CALIB. READ. = **101.1** ppm RF =1.00
OVM CALIB. GAS = **100** ppm
TIME: **7:10** am/pm DATE: **08/03/20**

MISCELL. NOTES

OCD NOTIFICATION: 07/31/20
SAMPLING DATE: 08/03/20

OVM = Organic Vapor Meter
ppm = parts per million
Magnetic declination: **10° E**

NOTES: AGT = ABOVE-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: 4/6/2019** ONSITE: **08/03/20**

envirotech
Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Area 1-5 Point Comp.
P008008-01 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes	
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch:	2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20		
Toluene	ND	0.0250	1	08/05/20	08/05/20		
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20		
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20		
o-Xylene	ND	0.0250	1	08/05/20	08/05/20		
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20		
Surrogate: 4-Bromochlorobenzene-PID		*100 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch:	2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20		
Surrogate: 1-Chloro-4-fluorobenzene-FID		*92.4 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch:	2032016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/05/20	08/05/20		
Oil Range Organics (C28-C40)	ND	50.0	1	08/05/20	08/05/20		
Surrogate: n-Nonane		*159 %*	*50-200*	*08/05/20*	*08/05/20*		
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch:	2032017
Chloride	ND	20.0	1	08/05/20	08/05/20		

envirotech
Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Area 2-5 Point Comp.
P008008-02 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes	
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch:	2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20		
Toluene	ND	0.0250	1	08/05/20	08/05/20		
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20		
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20		
o-Xylene	ND	0.0250	1	08/05/20	08/05/20		
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20		
Surrogate: 4-Bromochlorobenzene-PID		*101 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch:	2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20		
Surrogate: 1-Chloro-4-fluorobenzene-FID		*92.2 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch:	2032016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/05/20	08/05/20		
Oil Range Organics (C28-C40)	ND	50.0	1	08/05/20	08/05/20		
Surrogate: n-Nonane		*105 %*	*50-200*	*08/05/20*	*08/05/20*		
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch:	2032017
Chloride	ND	20.0	1	08/05/20	08/05/20		

envirotech
Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Area 3-5 Point Comp.
P008008-03 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes	
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch:	2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20		
Toluene	ND	0.0250	1	08/05/20	08/05/20		
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20		
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20		
o-Xylene	ND	0.0250	1	08/05/20	08/05/20		
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20		
Surrogate: 4-Bromochlorobenzene-PID		*99.9 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch:	2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20		
Surrogate: 1-Chloro-4-fluorobenzene-FID		*91.2 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch:	2032016
Diesel Range Organics (C10-C28)	**51.6**	25.0	1	08/05/20	08/05/20		
Oil Range Organics (C28-C40)	ND	50.0	1	08/05/20	08/05/20		
Surrogate: n-Nonane		*110 %*	*50-200*	*08/05/20*	*08/05/20*		
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch:	2032017
Chloride	ND	20.0	1	08/05/20	08/05/20		

envirotech
Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Area 4-5 Point Comp.
P008008-04 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes	
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch:	2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20		
Toluene	ND	0.0250	1	08/05/20	08/05/20		
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20		
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20		
o-Xylene	ND	0.0250	1	08/05/20	08/05/20		
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20		
Surrogate: 4-Bromochlorobenzene-PID		*101 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch:	2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20		
Surrogate: 1-Chloro-4-fluorobenzene-FID		*89.5 %*	*50-150*	*08/05/20*	*08/05/20*		
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch:	2032016
Diesel Range Organics (C10-C28)	**80.1**	25.0	1	08/05/20	08/05/20		
Oil Range Organics (C28-C40)	**74.9**	50.0	1	08/05/20	08/05/20		
Surrogate: n-Nonane		*86.4 %*	*50-200*	*08/05/20*	*08/05/20*		
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch:	2032017
Chloride	**40.1**	20.0	1	08/05/20	08/05/20		

Project Information | Chain of Custody | Page 1 of 1

Client: SIMCOE / BPX	Bill To
Project: HOLMBERG GC 001A	Attention: Steve Moskal - BPX
Project Manager: Steve Moskal	Address:
Address:	City, State, Zip
City, State, Zip	Phone:
Phone:	Email:
Email: Steve Moskal AND JEFF BLAGG	
Report due by: STANDARD TAT	

Lab Use Only: Lab WO# P008008 | Job Number 03143-0424

TAT: 1D | 3D

EPA Program: RCRA | CWA | SDWA

State: NM (X) | CO | UT | AZ | TX | OK

Time Sampled	Date Sampled	Matrix	No Containers	Sample ID	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	Remarks
0917	9/3/2020	SOIL	1	AREA 1 - 5 POINT COMP.	1	X	X	X			X	
0944	"	"	1	AREA 2 - 5 POINT COMP	2	"	"	"			"	
1012	"	"	1	AREA 3 - 5 POINT COMP	3	"	"	"			"	
1032	"	"	1	AREA 4 - 5 POINT COMP	4	"	"	"			"	

Additional Instructions: Client: BPX

4301204265

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action. Sampled by: Jeff Blagg

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Jeff Blagg	9/3/2020	1218	Raina Lopez	8/3/20	12:18

Lab Use Only: Received on ice: (Y) / N

T1 _____ T2 _____ T3 _____

AVG Temp °C 4

Sample Matrix: **S** - Soil, **Sd** - Solid, **Sg** - Sludge, **A** - Aqueous, **O** - Other _____

Container Type: **g** - glass, **p** - poly/plastic, **ag** - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech Analytical Laboratory
5796 US Highway 64, Farmington, NM 87401
24 Hour Emergency Response Phone (800) 362-1879
Ph (505) 632-1881 Fx (505) 632-1865
envirotech-inc.com
labadmin@envirotech-inc.com

envirotech
Analytical Laboratory

Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 8/3/2020

Job Number: 03143-0424

Work Order: P008008

Project Name/Location: Holmberg GC 001A

Report Reviewed By: _____ Date: 8/10/20

Walter Hinchman, Laboratory Director

NELAP ACCREDITED TNI LABORATORY

Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc, attests the data reported has not been altered in any way.
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.
Envirotech, Inc, holds the Utah TNI certification NM009792018-1 for the data reported.
Envirotech, Inc, holds the Texas TNI certification T104704557-19-2 for the data reported.

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Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Area 1-5 Point Comp.	P008008-01A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.
Area 2-5 Point Comp.	P008008-02A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.
Area 3-5 Point Comp.	P008008-03A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.
Area 4-5 Point Comp.	P008008-04A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.

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Analytical Laboratory

BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2032018-BLK1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	*8.12*		*8.00*		*102*	*50-150*			
LCS (2032018-BS1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Benzene	5.42	0.0250	5.00		108	70-130			
Toluene	5.43	0.0250	5.00		109	70-130			
Ethylbenzene	5.40	0.0250	5.00		108	70-130			
p,m-Xylene	10.8	0.0500	10.0		108	70-130			
o-Xylene	5.43	0.0250	5.00		109	70-130			
Total Xylenes	16.2	0.0250	15.0		108	0-200			
Surrogate: 4-Bromochlorobenzene-PID	*8.41*		*8.00*		*105*	*50-150*			
Matrix Spike (2032018-MS1)				**Source: P008005-01**					Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Benzene	5.36	0.0250	5.00	ND	107	54.3-133			
Toluene	5.37	0.0250	5.00	ND	107	61.4-130			
Ethylbenzene	5.34	0.0250	5.00	ND	107	61.4-133			
p,m-Xylene	10.7	0.0500	10.0	ND	107	63.3-131			
o-Xylene	5.37	0.0250	5.00	ND	107	63.3-131			
Total Xylenes	16.1	0.0250	15.0	ND	107	0-200			
Surrogate: 4-Bromochlorobenzene-PID	*8.33*		*8.00*		*104*	*50-150*			
Matrix Spike Dup (2032018-MSD1)				**Source: P008005-01**					Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Benzene	5.22	0.0250	5.00	ND	104	54.3-133	2.71	20	
Toluene	5.20	0.0250	5.00	ND	104	61.4-130	3.17	20	
Ethylbenzene	5.17	0.0250	5.00	ND	103	61.4-133	3.38	20	
p,m-Xylene	10.3	0.0500	10.0	ND	103	63.3-131	3.44	20	
o-Xylene	5.19	0.0250	5.00	ND	104	63.3-131	3.37	20	
Total Xylenes	15.5	0.0250	15.0	ND	104	0-200	3.41	200	
Surrogate: 4-Bromochlorobenzene-PID	*8.10*		*8.00*		*101*	*50-150*			

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BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2032018-BLK1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.16*		*8.00*		*89.5*	*50-150*			
LCS (2032018-BS2)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Gasoline Range Organics (C6-C10)	45.6	20.0	50.0		91.2	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.29*		*8.00*		*91.1*	*50-150*			
Matrix Spike (2032018-MS2)									**Source: P008005-01** Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Gasoline Range Organics (C6-C10)	43.9	20.0	50.0	ND	87.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.36*		*8.00*		*91.9*	*50-150*			
Matrix Spike Dup (2032018-MSD2)									**Source: P008005-01** Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Gasoline Range Organics (C6-C10)	44.8	20.0	50.0	ND	89.6	70-130	2.06	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.22*		*8.00*		*90.2*	*50-150*			

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BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2032016-BLK1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	*45.7*		*50.0*		*91.3*	*50-200*			
LCS (2032016-BS1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Diesel Range Organics (C10-C28)	439	25.0	500		87.9	38-132			
Surrogate: n-Nonane	*47.3*		*50.0*		*94.6*	*50-200*			
Matrix Spike (2032016-MS1)				**Source: P007096-01**					Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Diesel Range Organics (C10-C28)	2130	125	500	1430	141	38-132			M2
Surrogate: n-Nonane	*68.2*		*50.0*		*136*	*50-200*			
Matrix Spike Dup (2032016-MSD1)				**Source: P007096-01**					Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Diesel Range Organics (C10-C28)	2030	125	500	1430	120	38-132	5.02	20	
Surrogate: n-Nonane	*63.9*		*50.0*		*128*	*50-200*			

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BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2032017-BLK1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Chloride	ND	20.0							
LCS (2032017-BS1)									Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Chloride	271	20.0	250		108	90-110			
Matrix Spike (2032017-MS1)					**Source: P008005-01**				Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Chloride	257	20.0	250	ND	103	80-120			
Matrix Spike Dup (2032017-MSD1)					**Source: P008005-01**				Prepared: 08/05/20 0 Analyzed: 08/05/20 1
Chloride	250	20.0	250	ND	100	80-120	2.73	20	

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values my differ slightly.

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Analytical Laboratory

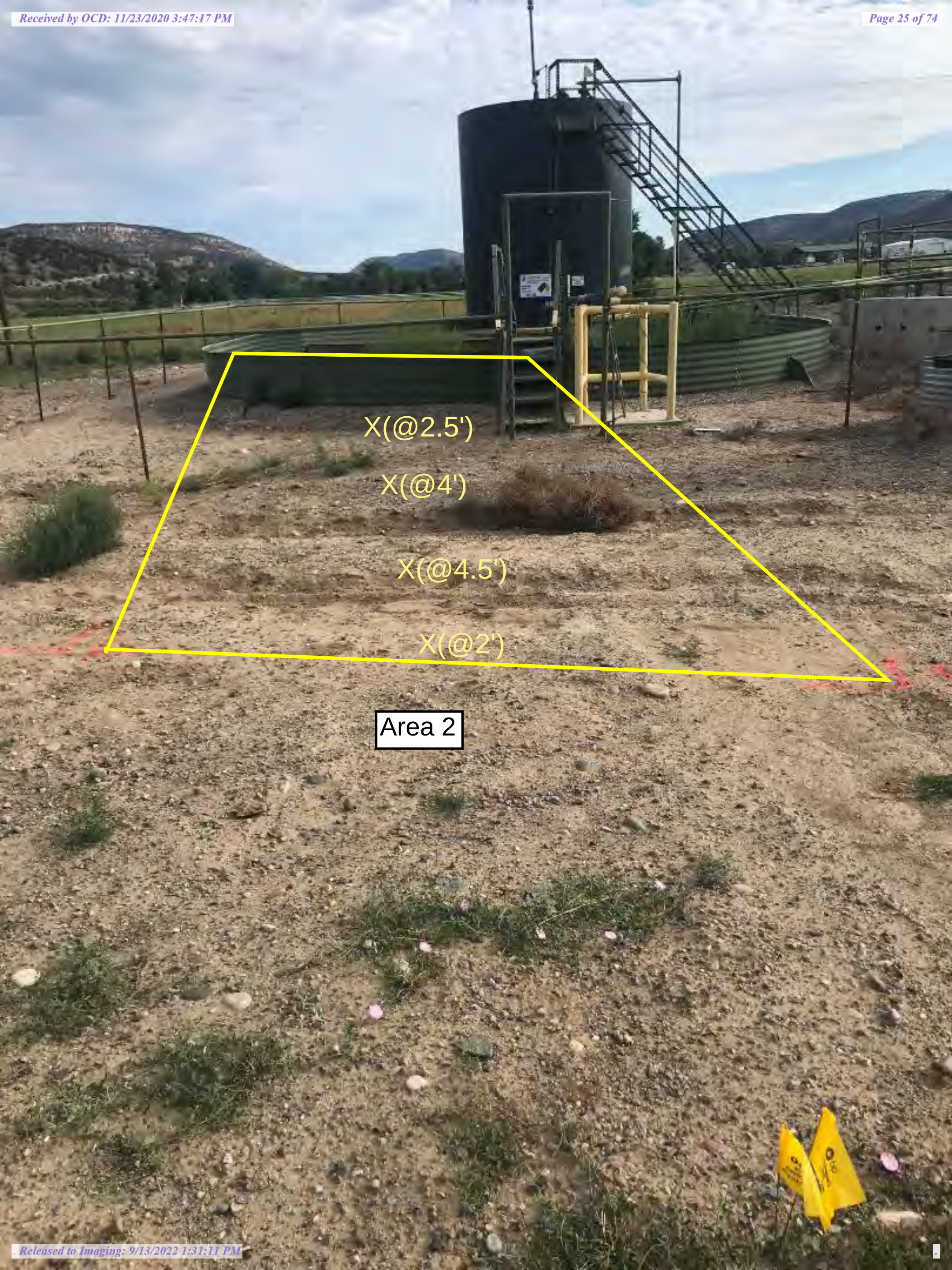
BP America Production Co.	Project Name:	Holmberg GC 001A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	08/10/20 10:46

Notes and Definitions

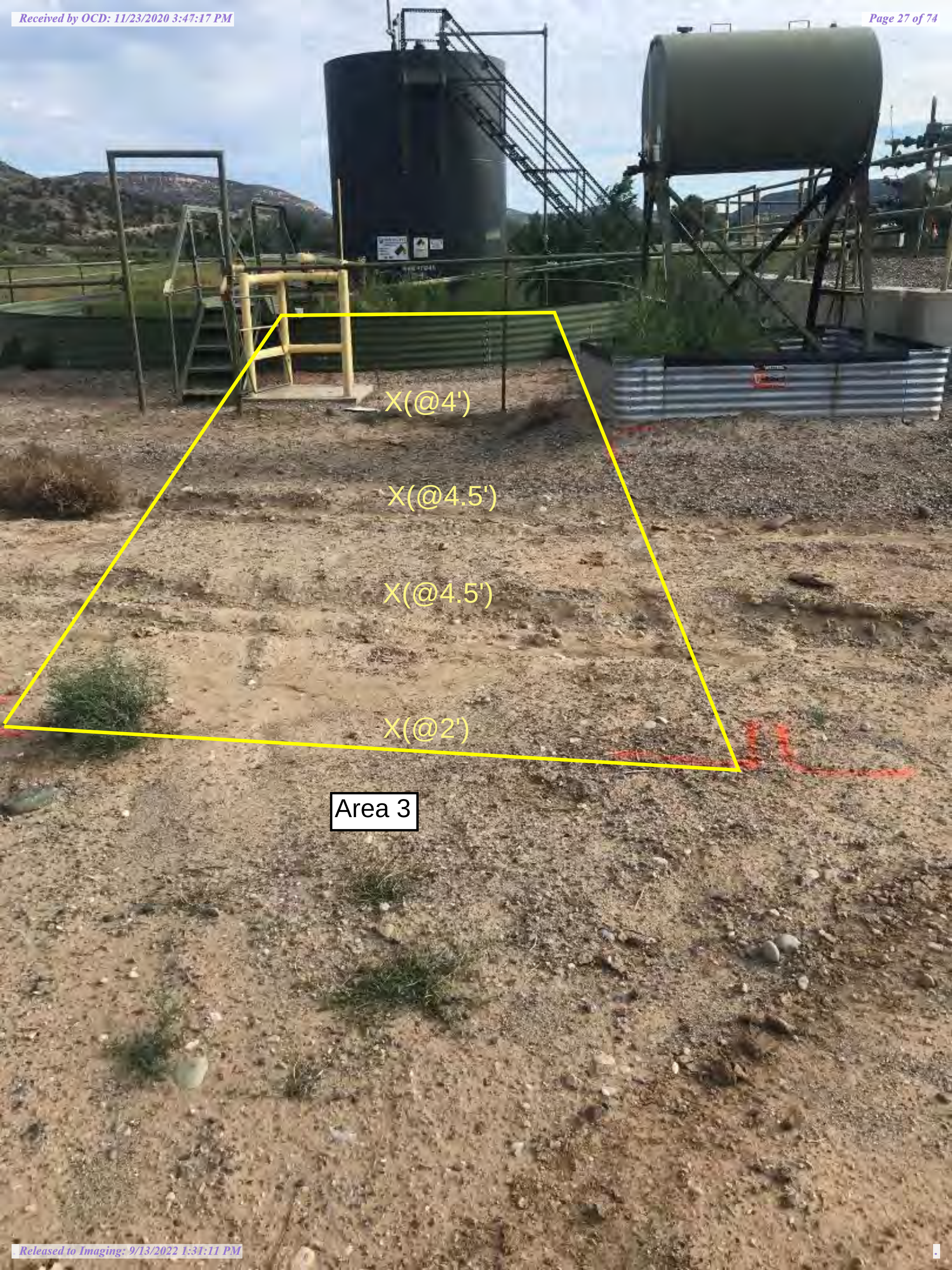
M2	Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference
**	Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.


X(@2')
X(@2.5')
X(@2')
X(@4')
X(@2')
Area 1


X(@2.5')
X(@4')
X(@4.5')
X(@2')
Area 2


X(@2')
Area 2
(Within Tank Ring


X(@4')
X(@4.5')
X(@4.5')
X(@2')
Area 3


Area 3
(Within Tank Ring
X(@2')


X(@2')
X(@4.5')
X(@2')
X(@4')
X(@2')
Area 4

OCTOBER 6, 2020

SAMPLING EVENT

CLIENT: **BP/SIMCOE**

COTTONWOOD CONSULTING LLC
P.O. BOX 1653, DURANGO, COLO. 81303
(970) 764-7356

API #: **3004522631**
TANK ID (if applicble): **NA**

FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / [OTHER:]
RELEASE CLOSURE SAMPLING

PAGE #: **2** of **2**

SITE INFORMATION:

SITE NAME: **HOLMBERG GC # 1A**

QUAD/UNIT: **P** SEC: **28** TWP: **32N** RNG: **10W** PM: **NM** CNTY: **SJ** ST: **NM**

1/4 -1/4/FOOTAGE: **1,165'S / 810'E** **SE/SE** LEASE TYPE: FEDERAL / STATE / [FEE] / INDIAN

LEASE #: **-** PROD. FORMATION: **MV** CONTRACTOR: **KELLEY O.F.S. BP/SIMCOE - D. BULLER**

DATE STARTED: **10/06/20**
DATE FINISHED:
ENVIRONMENTAL SPECIALIST(S): **NJV**

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: **36.952327 X 107.881117** GL ELEV.: **5,873'**

1) **POINT OF RELEASE (POR)**	GPS COORD.: **36.952609 X 107.881083**	DISTANCE/BEARING FROM P&A: **103', N5E**
2)	GPS COORD.:	DISTANCE/BEARING FROM P&A:
3)	GPS COORD.:	DISTANCE/BEARING FROM P&A:
4)	GPS COORD.:	DISTANCE/BEARING FROM P&A:

SAMPLING DATA:

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

	SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	OVM READING (ppm)
1)	**NSW @ 2.5' - 3'**	**10/06/20**	**0920**	**8015B**	**NA**
2)	**N. BASE @ 4'**	**10/06/20**	**0925**	**8015B**	**NA**
3)	**SSW @ 3'**	**10/06/20**	**0938**	**8015B**	**NA**
4)	**S. BASE @ 4'**	**10/06/20**	**0943**	**8015B**	**NA**
5)	**ESW @ 2.5' - 3'**	**10/06/20**	**0953**	**8015B**	**NA**
6)	**E. BASE @ 4'**	**10/06/20**	**0956**	**8015B**	**NA**

SOIL DESCRIPTION:

SOIL TYPE: [SAND] / SILTY SAND / SILT / SILTY CLAY / CLAY / [GRAVEL] / OTHER **LARGE RIVER COBBLES**

SOIL COLOR: **DARK YELLOWISH BROWN**

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

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

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

SAMPLE TYPE: GRAB / [COMPOSITE] - # OF PTS. **2**

DISCOLORATION/STAINING OBSERVED: YES / [NO] EXPLANATION -

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

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

HC ODOR DETECTED: YES / [NO] EXPLANATION -

ANY AREAS DISPLAYING WETNESS: YES / [NO] EXPLANATION -

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION - **OIL HAULING TRUCK HOSE FAILURE IN JAN. 2018**

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED : [YES] NO EXPLANATION:

EQUIPMENT SET OVER RECLAIMED AREA: YES / [NO] EXPLANATION -

OTHER: **NMOCD REP. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. ALL 6 SAMPLES CONSISTED OF 2 POINT COMPOSITES.**

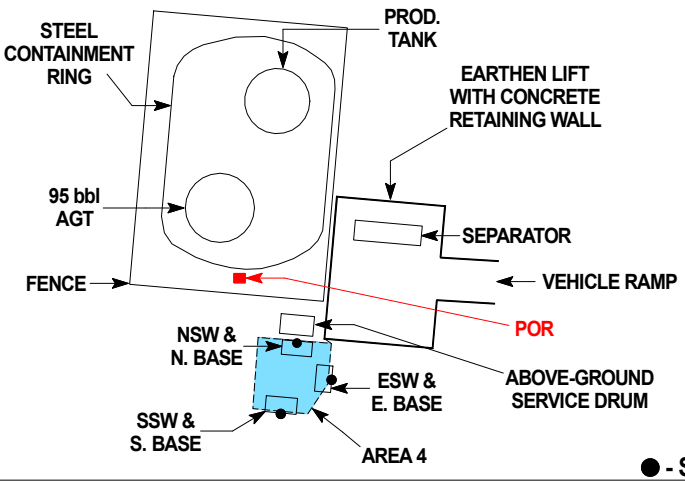
EXCAVATION DIMENSION ESTIMATION: _____ ft. X _____ ft. X _____ ft. EXCAVATION ESTIMATION (Cubic Yards) :

DEPTH TO GROUNDWATER: **<50'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **300'<x<1,000'** NMOCD TPH CLOSURE STD: **100** ppm

SITE SKETCH

BGT Located : off / on site

PLOT PLAN circle: attached



X - BASE S.P.D.
● - SIDEWALL S.P.D.

OVM CALIB. READ. = **NA** ppm RF =1.00
OVM CALIB. GAS = **NA** ppm
TIME: **NA** am/pm DATE: **NA**

MISCELL. NOTES

OCD NOTIFICATION: 10/02/20
SAMPLING DATE: 10/06/20

OVM = Organic Vapor Meter
ppm = parts per million
Magnetic declination: **10°** E

NOTES: AGT = ABOVE-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: 4/6/2019** ONSITE: **08/03/20, 10/06/20**

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

NSW @ 2.5'-3'

E010020-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*86.3 %*	*70-130*	*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	ND	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	ND	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane		*88.5 %*	*50-200*	*10/07/20*	*10/07/20*	

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

N. BASE @ 4'

E010020-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*84.5 %*	*70-130*	*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	ND	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	ND	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane		*79.1 %*	*50-200*	*10/07/20*	*10/07/20*	

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

SSW @ 3'

E010020-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*88.1 %*	*70-130*		*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	ND	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	ND	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane	*163 %*	*50-200*		*10/07/20*	*10/07/20*	

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

S. BASE @ 4'

E010020-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*87.4 %*	*70-130*		*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	ND	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	ND	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane	*103 %*	*50-200*		*10/07/20*	*10/07/20*	

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

ESW @ 2.5'-3'

E010020-05

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*85.6 %*	*70-130*	*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	ND	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	ND	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane		*89.1 %*	*50-200*	*10/07/20*	*10/07/20*	

Sample Data

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

E. BASE @ 4'

E010020-06

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RS			Batch: 2041013
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/07/20	10/07/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*88.0 %*	*70-130*		*10/07/20*	*10/07/20*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL			Batch: 2041012
Oil Range Organics (C28-C40)	**63.1**	50.0	1	10/07/20	10/07/20	
Diesel Range Organics (C10-C28)	**34.2**	25.0	1	10/07/20	10/07/20	
Surrogate: n-Nonane	*100 %*	*50-200*		*10/07/20*	*10/07/20*	

Project Information | Chain of Custody | Page 1 of 1

Client: BP
Project: Holmberg GC # 1A
Project Manager: Steve Moskal
Address: 1199 Main Ave., Suite 101
City, State, Zip Durango, CO 81301
Phone: (505) 330-9179 - S. Moskal
Email: See "additional instructions" below

Report Attention
Report due by:
Attention: Steve Moskal
Address:
City, State, Zip
Phone: N. Velez (505) 320-3489; S. Moskal (505) 330-9179
Email: See "additional instructions" below

Lab Use Only
Lab WO# E010020 | Job Number 03143-0424

TAT: 1D | 3D
EPA Program: RCRA | CWA | SDWA
State: NM X | CO | UT | AZ

Time Sampled	Date Sampled	Matrix	No Containers	Sample ID	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	TPH 418.1			# composite pts.	grab sample	Remarks
0920	10/06/20	SOIL	1-4 oz.	NSW @ 2.5' - 3'	1	X	X								2		
0925	10/06/20	SOIL	1-4 oz.	N. BASE @ 4'	2	X	X								2		
0938	10/06/20	SOIL	1-4 oz.	SSW @ 3'	3	X	X								2		
0943	10/06/20	SOIL	1-4 oz.	S. BASE @ 4'	4	X	X								2		
0953	10/06/20	SOIL	1-4 oz.	ESW @ 2.5' - 3'	5	X	X								2		
0956	10/06/20	SOIL	1-4 oz.	E. BASE @ 4'	6	X	X								2		

Analysis and Method

Additional Instructions: Send emails to: Steven.Moskal@bpx.com, Don.Buller@bpx.com, ksiesser@cottonwoodconsulting.com, jharter@cottonwoodconsulting.com, & nvelez@cottonwoodconsulting.com. use PO under 2H 2020 spill.

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action. Sampled by: Nelson Velez

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
[signature]	10/6/20	1316	[signature]	10/6/20	13:16
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

Lab Use Only
Received on ice: (Y) N
T1 T2 T3
AVG Temp °C 4

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other _____

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech Analytical Laboratory
5796 US Highway 64, Farmington, NM 87401 | Ph (505) 632-0615 Fx (505) 632-1865
Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301 | Ph (970) 259-0615 Fr (800) 362-1879

Report to:
Steve Moskal
PO Box 22024
Tulsa, OK 74121-2024




5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com

envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

BP America Production Co.

Project Name: Holmberg GC #1A

Work Order: E010020

Job Number: 03143-0424

Received: 10/6/2020

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
10/12/20

Date Reported: 10/12/20

Steve Moskal
PO Box 22024
Tulsa, OK 74121-2024

Project Name: Holmberg GC #1A
Workorder: E010020
Date Received: 10/6/2020 1:16:00PM

Steve Moskal,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 10/6/2020 1:16:00PM, under the Project Name: Holmberg GC #1A.

The analytical test results summarized in this report with the Project Name: Holmberg GC #1A apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Lopez
Laboratory Administrator
Office: 505-632-1881
rlopez@envirotech-inc.com

Alexa Michaels
Sample Custody Officer
Office: 505-632-1881
labadmin@envirotech-inc.com

Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

BP America Production Co.	Project Name:	Holmberg GC #1A	**Reported:**
PO Box 22024	Project Number:	03143-0424	
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/20 09:25

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
NSW @ 2.5'-3'	E010020-01A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.
N. BASE @ 4'	E010020-02A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.
SSW @ 3'	E010020-03A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.
S. BASE @ 4'	E010020-04A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.
ESW @ 2.5'-3'	E010020-05A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.
E. BASE @ 4'	E010020-06A	Soil	10/06/20	10/06/20	Glass Jar, 4 oz.

QC Summary Data

BP America Production Co.	Project Name:	Holmberg GC #1A	**Reported:**
PO Box 22024	Project Number:	03143-0424	
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: RS

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2041013-BLK1)									Prepared: 10/07/20 Analyzed: 10/07/20
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*6.86*		*8.00*		*85.8*	*70-130*			
LCS (2041013-BS2)									Prepared: 10/07/20 Analyzed: 10/07/20
Gasoline Range Organics (C6-C10)	43.3	20.0	50.0		86.6	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.07*		*8.00*		*88.4*	*70-130*			
Matrix Spike (2041013-MS2)				**Source: E010017-01**					Prepared: 10/07/20 Analyzed: 10/07/20
Gasoline Range Organics (C6-C10)	41.9	20.0	50.0	ND	83.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*6.90*		*8.00*		*86.3*	*70-130*			
Matrix Spike Dup (2041013-MSD2)				**Source: E010017-01**					Prepared: 10/07/20 Analyzed: 10/07/20
Gasoline Range Organics (C6-C10)	43.9	20.0	50.0	ND	87.7	70-130	4.55	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*6.78*		*8.00*		*84.7*	*70-130*			

QC Summary Data

BP America Production Co.	Project Name:	Holmberg GC #1A	**Reported:**
PO Box 22024	Project Number:	03143-0424	
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/2020 9:25:46AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2041012-BLK1)									Prepared: 10/06/20 Analyzed: 10/06/20
Oil Range Organics (C28-C40)	ND	50.0							
Diesel Range Organics (C10-C28)	ND	25.0							
Surrogate: n-Nonane	*45.3*		*50.0*		*90.6*	*50-200*			
LCS (2041012-BS1)									Prepared: 10/06/20 Analyzed: 10/06/20
Diesel Range Organics (C10-C28)	475	25.0	500		95.0	38-132			
Surrogate: n-Nonane	*47.4*		*50.0*		*94.8*	*50-200*			
Matrix Spike (2041012-MS1)				**Source: E010009-01**					Prepared: 10/06/20 Analyzed: 10/06/20
Diesel Range Organics (C10-C28)	690	25.0	500	102	118	38-132			
Surrogate: n-Nonane	*57.3*		*50.0*		*115*	*50-200*			
Matrix Spike Dup (2041012-MSD1)				**Source: E010009-01**					Prepared: 10/06/20 Analyzed: 10/06/20
Diesel Range Organics (C10-C28)	690	25.0	500	102	118	38-132	0.0104	20	
Surrogate: n-Nonane	*59.3*		*50.0*		*119*	*50-200*			

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

Definitions and Notes

BP America Production Co.	Project Name:	Holmberg GC #1A	
PO Box 22024	Project Number:	03143-0424	**Reported:**
Tulsa OK, 74121-2024	Project Manager:	Steve Moskal	10/12/20 09:25

ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Envirotech Analytical Laboratory

Printed: 10/6/2020 3:45:38PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.
If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	BP America Production Co.	Date Received:	10/06/20 13:16	Work Order ID:	E010020
Phone:	(800) 284-2244	Date Logged In:	10/06/20 15:37	Logged In By:	Alexa Michaels
Email:	steven.moskal@bpx.com	Due Date:	10/13/20 17:00 (5 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC?	Yes	
2. Does the number of samples per sampling site location match the COC	Yes	
3. Were samples dropped off by client or carrier?	Yes	Carrier: Nelson Velez
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

Comments/Resolution

Sample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT?	No

Sample Cooler

7. Was a sample cooler received?	Yes
8. If yes, was cooler received in good condition?	Yes
9. Was the sample(s) received intact, i.e., not broken?	Yes
10. Were custody/security seals present?	No
11. If yes, were custody/security seals intact?	NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling	Yes
13. If no visible ice, record the temperature. Actual sample temperature: 4°C	

Sample Container

14. Are aqueous VOC samples present?	No
15. Are VOC samples collected in VOA Vials?	NA
16. Is the head space less than 6-8 mm (pea sized or less)?	NA
17. Was a trip blank (TB) included for VOC analyses?	NA
18. Are non-VOC samples collected in the correct containers?	Yes
19. Is the appropriate volume/weight or number of sample containers collected?	Yes

Field Label

20. Were field sample labels filled out with the minimum information:	
Sample ID?	Yes
Date/Time Collected?	Yes
Collectors name?	Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved?	No
22. Are sample(s) correctly preserved?	NA
24. Is lab filteration required and/or requested for dissolved metals?	No

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase?	No
27. If yes, does the COC specify which phase(s) is to be analyzed?	NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory?	No	
29. Was a subcontract laboratory specified by the client and if so who?	NA	Subcontract Lab: NA

Client Instruction

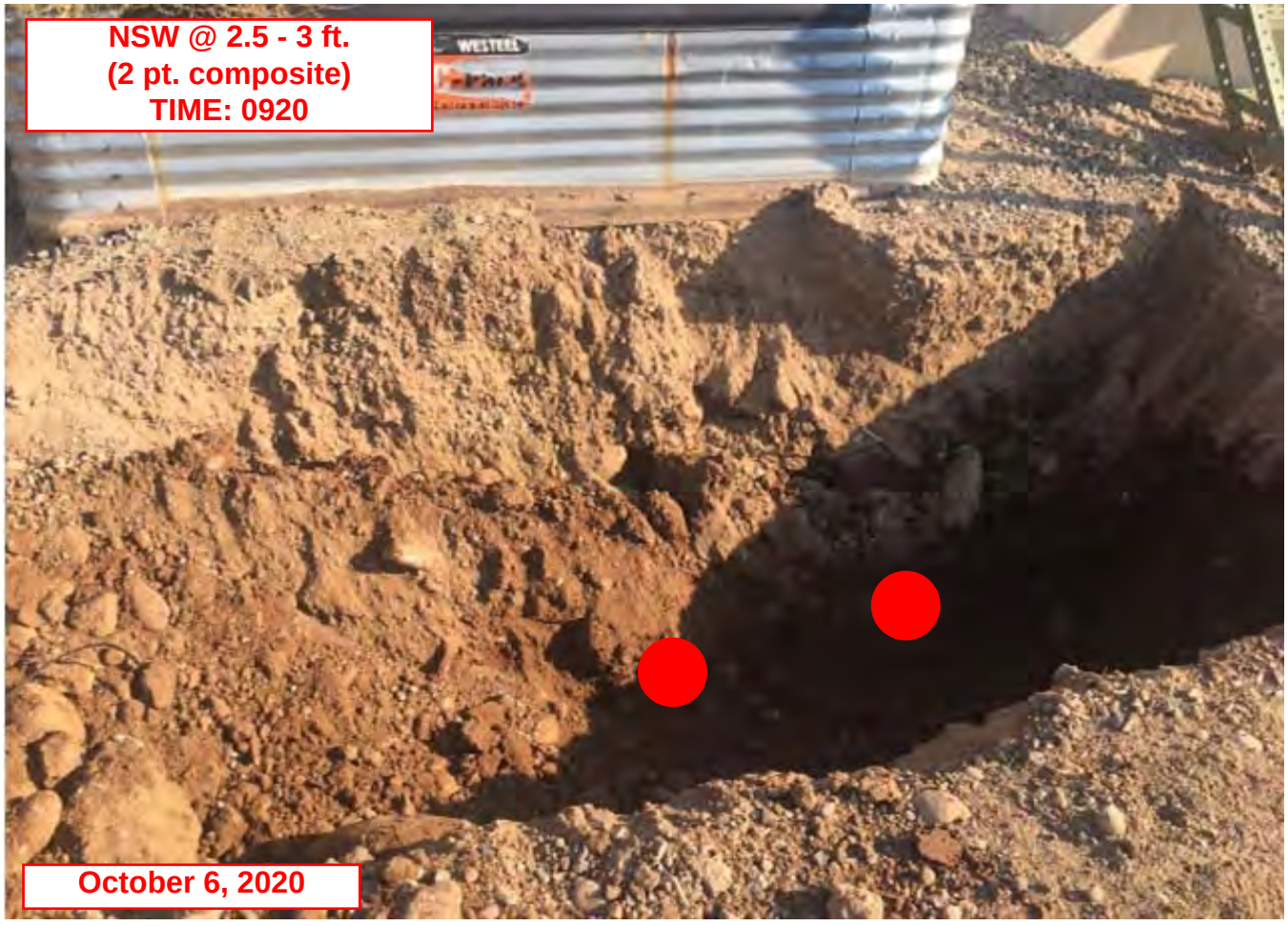
Email to: steven.moskal@bpx.com, Don.Buller@bpx.com, ksiesser@cottonwoodconsulting.com, jharter@cottonwoodconsulting.com, nvelez@cottonwoodconsulting.com

Signature of client authorizing changes to the COC or sample disposition.

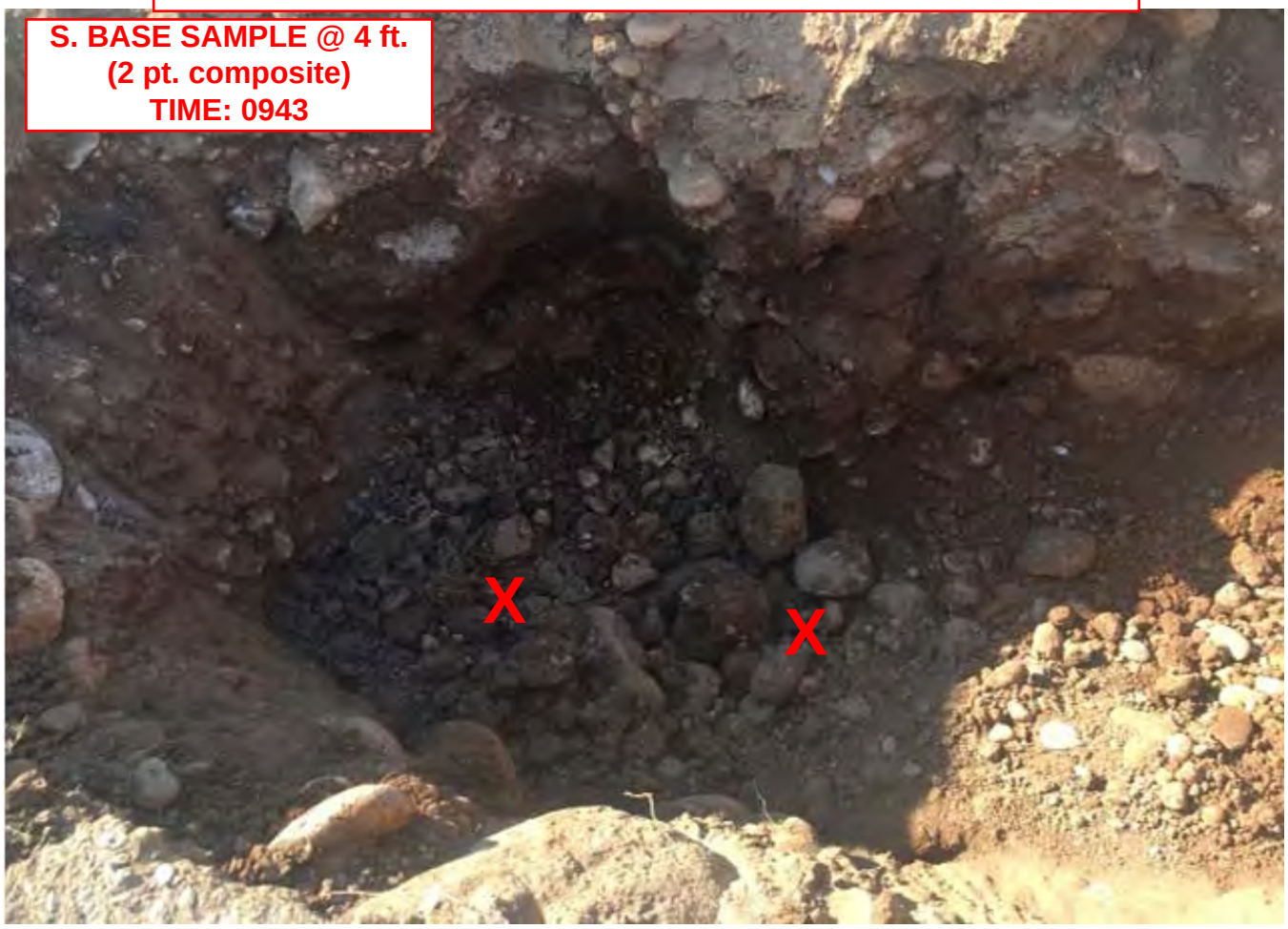
Date

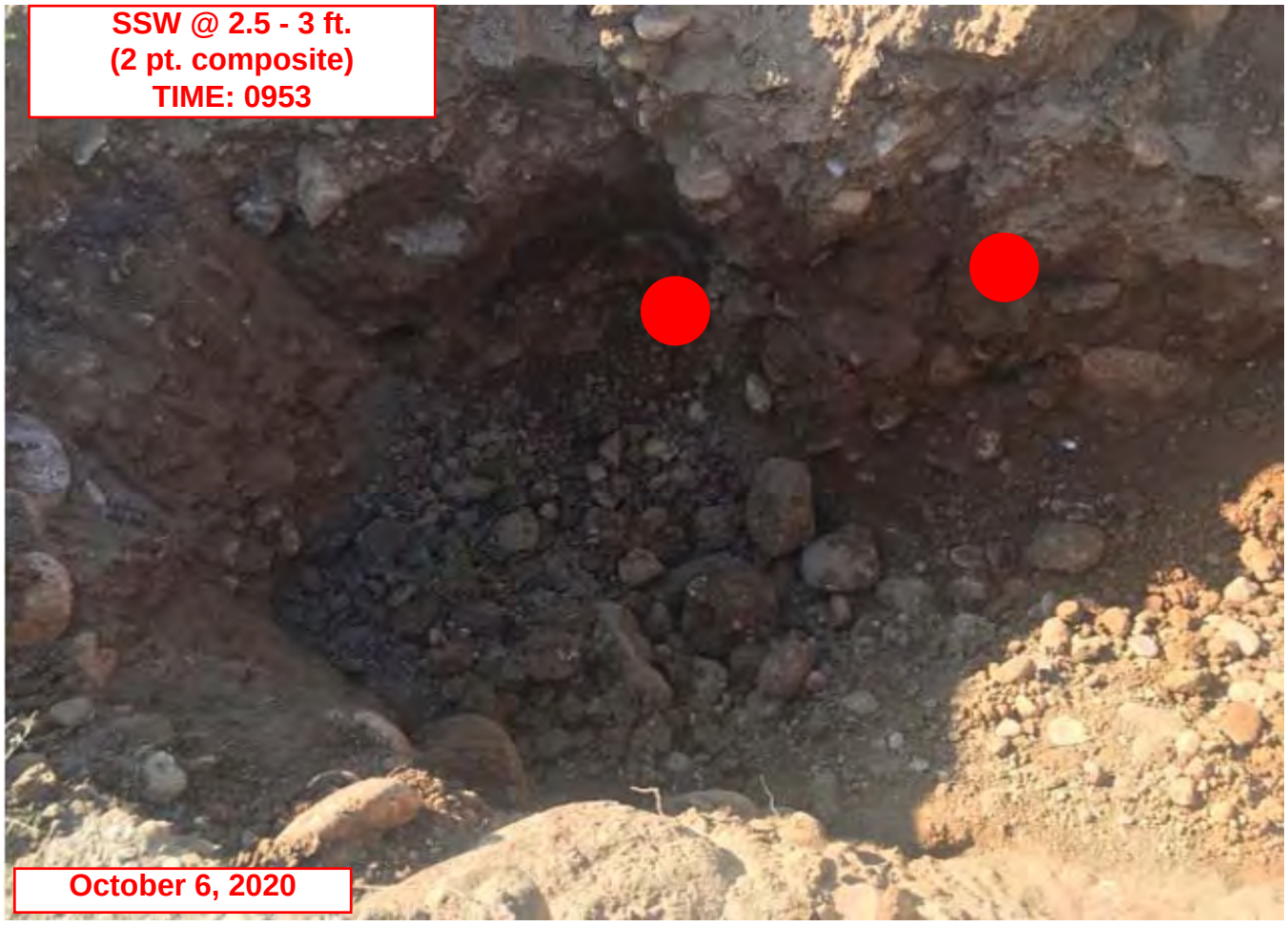
envirotech Inc.


N. BASE SAMPLE @ 4 ft.
(2 pt. composite)
TIME: 0925
X
X

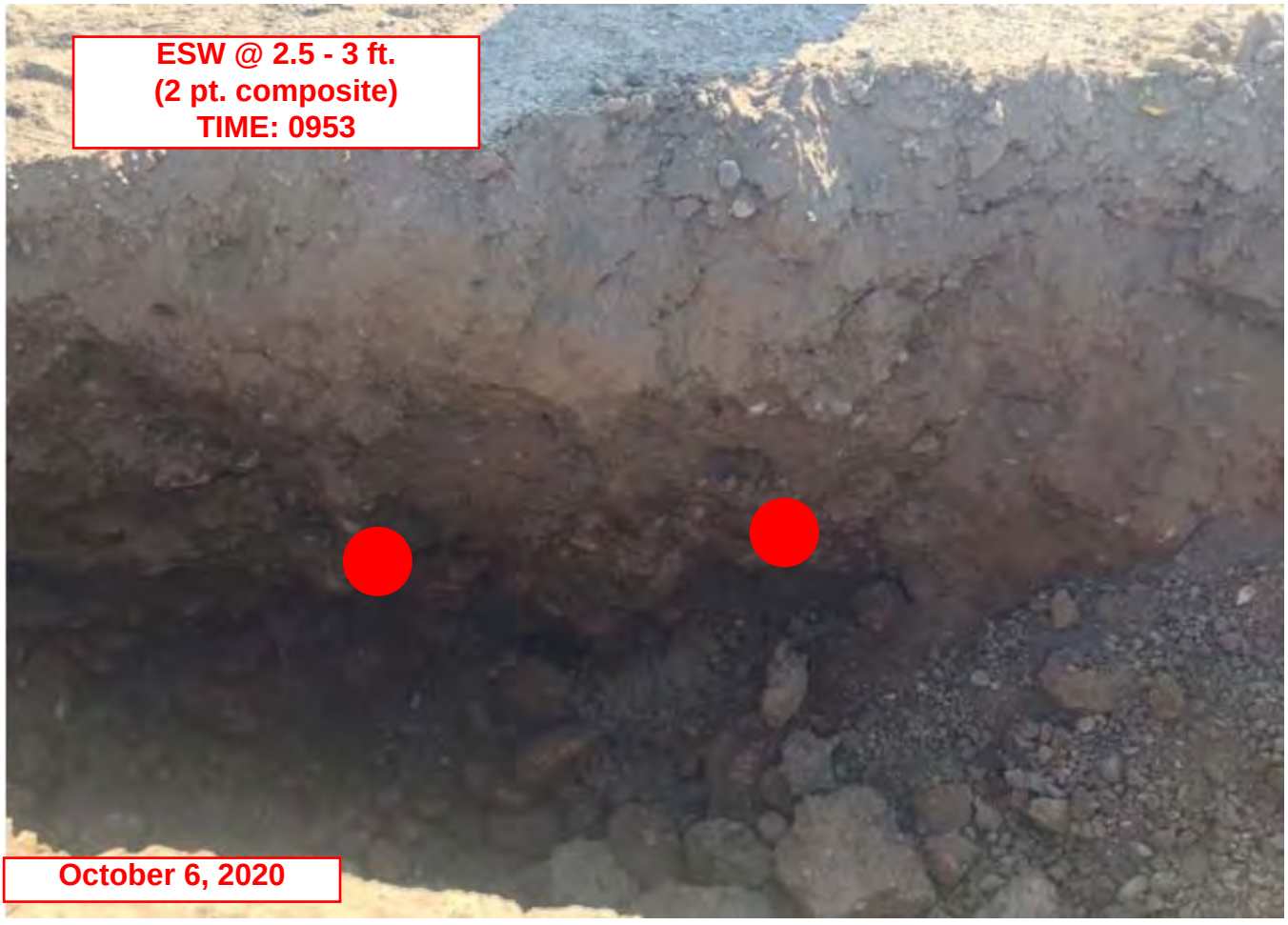

NSW @ 2.5 - 3 ft.
(2 pt. composite)
TIME: 0920
October 6, 2020

BP / SIMCOE - HOLMBERG GAS COM 001A





BP / SIMCOE - HOLMBERG GAS COM 001A



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

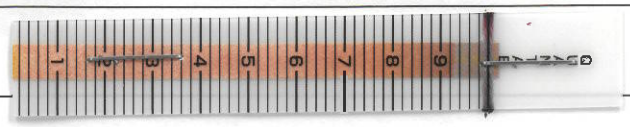
Form C-138
Revised August 1, 2011

*Surface Waste Management Facility Operator and Generator shall maintain and make this documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. **Generator Name and Address:**
Simcoe LLC operated by BP America Production Co. 1199 Main Street, Suite 101, Durango, CO 81301

2. **Originating Site:**
Holmberg GC 001A
Don Buller will approve.



3. **Location of Material (Street Address, City, State or ULSTR):**
P-28-32N-10W

4. **Source and Description of Waste:** Hydrocarbon impacted soil associated with production tank remediation.

Estimated Volume 10 ☐ yd³ / ☐ bbls Known Volume (to be entered by the operator at the end of the haul) 20 ☐ yd³ / ☐ bbls

5. **GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS**

I, Steve Moskal, representative or authorized agent for BP America Production Company do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. *Operator Use Only: Waste Acceptance Frequency* ☒ *Monthly* ☐ *Weekly* ☐ *Per Load*

☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☒ Process Knowledge ☐ Other Laboratory Analysis provided.

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

I, Steve Moskal, representative for BP America Production Company authorize IEI/JFJ to complete the required testing/sign the Generator Waste Testing Certification.

I, Roger Tinsley, representative for FEF do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

5. **Transporter:**
Kelley CL <120 PL-7

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: **JFJ Landfarm/Industrial Ecosystems, Inc. *Permit#: NM01-0010B**

Address of Facility: **# 49 CR 3150 Aztec, NM 87410**

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☒ Landfarm ☐ Landfill ☐ Other

Waste Acceptance Status:

☒ **APPROVED** ☐ **DENIED** (Must Be Maintained As Permanent Record)

PRINT NAME: Roger Tinsley TITLE: Trans Coord DATE: 10/6/20

SIGNATURE: _____ TELEPHONE NO.: 505 6321782
Surface Waste Management Facility Authorized Agent

EMAIL

NOTIFICATIONS

From: Steven Moskal
Sent: Monday, June 1, 2020 3:25:39 PM
To: Cory Smith - NMOCD (Cory.Smith@state.nm.us) <Cory.Smith@state.nm.us>
Cc: jeffcblagg@aol.com <jeffcblagg@aol.com>
Subject: Holmberg GC 001A Follow Up Sampling

Cory,

As discussed, the subject location had a release associated with an oil hauling truck which had a hose failure on January 15, 2018. However, the sampling was not adequate post excavation. The excavation varied from 1.5' on the north half to 4.5 deep on the south end. The approximate area of release is depicted on the attached figure labeled 1.15.18. Incident #NVF1802648183.

I propose to segment the release are, approximately 1,000 sq ft, into 4 areas, areas 1-4 on the attached figure labeled 6.1.20. The sampling will be performed with a hand auger or backhoe where access allows. One, five-point, composite sample will be collected from each area and will include the areas outside the estimated excavation area to account for sidewall. For area 1 and 4, this will include 3 points form sidewalls and two from the base. For areas 2 and 3, this will include 2 sidewalls (north and south) and 3 base to total 5 points for each sample area.

Let me know your thoughts.

Thank you,

Steve Moskal
Environmental Coordinator
BP America Production Co.
bpx energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179
steven.moskal@bpx.com

bpx energy

From: Steven Moskal <steven.moskal@bpx.com>
To: Cory Smith - NMOCD (Cory.Smith@state.nm.us) <cory.smith@state.nm.us>
Cc: jeffcblagg@aol.com <jeffcblagg@aol.com>; Don Buller <don.buller@bpx.com>; blagg_njv@yahoo.com <blagg_njv@yahoo.com>; Kyle Siesser (ksiesser@cottonwoodconsulting.com) <ksiesser@cottonwoodconsulting.com>
Sent: Tuesday, July 28, 2020, 06:43:49 AM MDT
Subject: Re: Holmberg GC 001A Follow Up Sampling

Cory,

The closure sampling of this release is scheduled for Monday, 8/3, at 8:00 AM. Please reference our previous correspondence in terms of the sampling plan.

Thank you,

Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

From: Steven Moskal <Steven.Moskal@BPX.COM>
Sent: Monday, September 21, 2020 12:36 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: nvelez@cottonwoodconsulting.com; Don Buller <DON.BULLER@BPX.COM>
Subject: [EXT] Holmberg GC 001A - Request for extension

Cory,

Attached are the field report and lab results for the closure sampling activities at the subject site; Incident #cVF1802648427.

Based on the results, BP will need to return to the site to further excavated/remediate to the lateral and vertical extents of area 4 with TPH results 155 ppm.

BP requests an additional 30 days to schedule and execute the work, with a final report to be issued to the NMOCD within 45 days.

Please let me know if you approve.

Thank you,

Steve Moskal
Environmental Coordinator
BP America Production Co. | bpx energy - WBU
1199 Main Ave. | Suite 101 | Durango | CO | 81301
Direct: 505.330.9179
steven.moskal@bpx.com

bpx energy

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, September 23, 2020 8:34:03 AM
To: Steven Moskal <Steven.Moskal@BPX.COM>
Cc: nvelez@cottonwoodconsulting.com <nvelez@cottonwoodconsulting.com>; Don Buller <DON.BULLER@BPX.COM>
Subject: RE: Holmberg GC 001A - Request for extension

Steve,

I don't see an incident# #cVF1802648427

Is the release your talking about the NVF1802648183?

Cory Smith
Environmental Specialist
Oil Conservation Division | Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410?
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Steven Moskal <Steven.Moskal@BPX.COM>
Sent: Wednesday, September 23, 2020 8:36 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: nvelez@cottonwoodconsulting.com; Don Buller <DON.BULLER@BPX.COM>
Subject: [EXT] Re: Holmberg GC 001A - Request for extension

I copied and pasted directly from the NMOCD well search page, so I am not sure.

Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, September 23, 2020 8:37:34 AM
To: Steven Moskal <Steven.Moskal@BPX.COM>
Cc: nvelez@cottonwoodconsulting.com <nvelez@cottonwoodconsulting.com>; Don Buller <DON.BULLER@BPX.COM>
Subject: RE: Holmberg GC 001A - Request for extension

Steve,

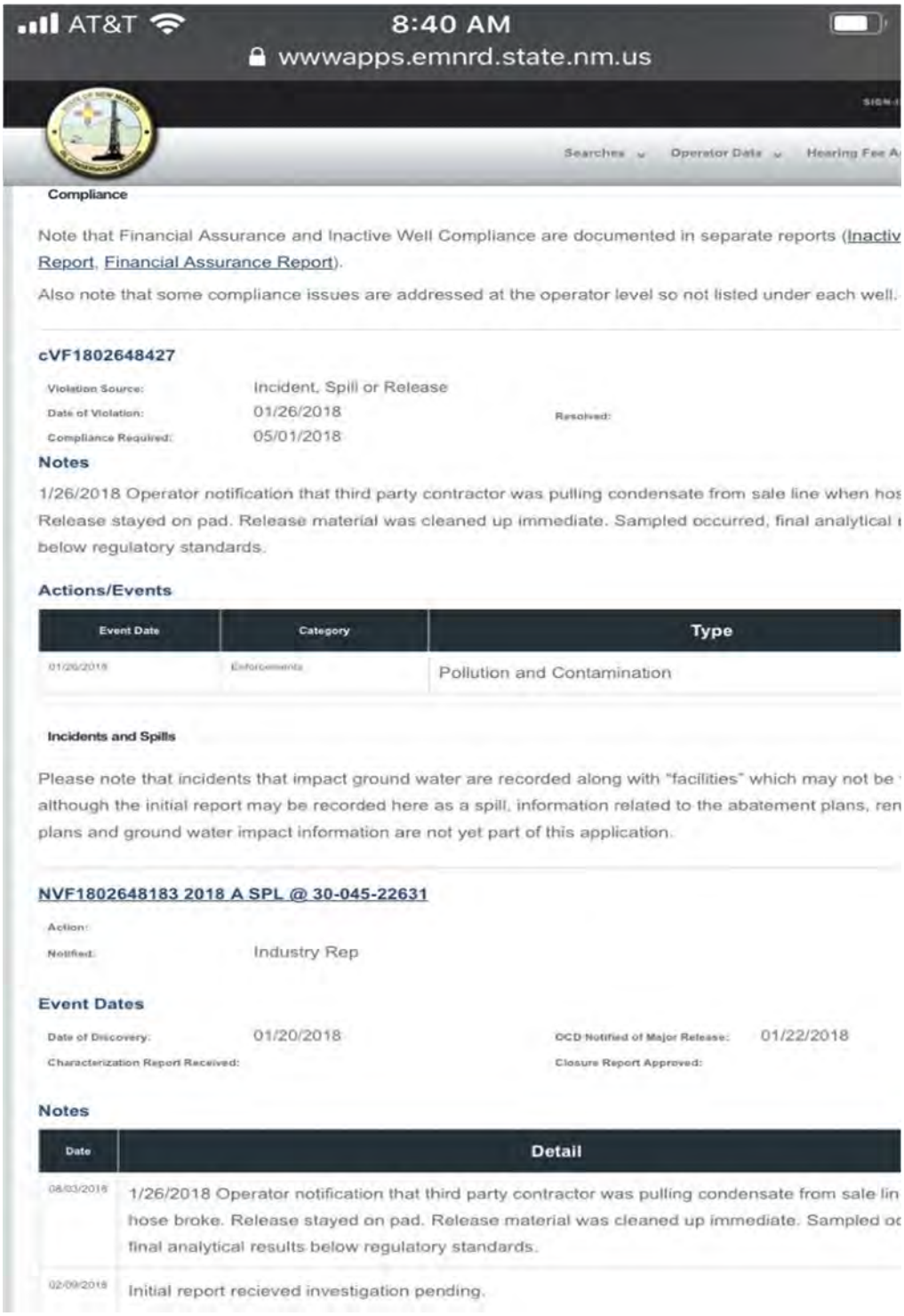
That's the only incident for the API# I got off the documents you sent.. not sure were you got the C# I think that's a compliance issue.. let me see if I can find it..

This release was from 2018?

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Steven Moskal <Steven.Moskal@BPX.COM>
Sent: Wednesday, September 23, 2020 8:42 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: nvelez@cottonwoodconsulting.com; Don Buller <DON.BULLER@BPX.COM>
Subject: [EXT] Re: Holmberg GC 001A - Request for extension

Yes Cory, it does appear it is a compliance number, sorry for the confusion.



Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, September 23, 2020 8:46 AM
To: Steven Moskal <Steven.Moskal@BPX.COM>
Cc: nvelez@cottonwoodconsulting.com; Don Buller <DON.BULLER@BPX.COM>
Subject: RE: Holmberg GC 001A - Request for extension

Steve,

The number you provided me was a compliance issue that Vanessa set up. Incident# associated with wells will always be found under the Incidents and spills.

OK, I am find with the extension please submit the Closure report no later than December 1, 2020. Please include this approval in your Final C-141

Thanks,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Steven Moskal
Sent: Thursday, October 1, 2020 11:27 AM
To: Smith, Cory, EMNRD
Cc: Nelson Velez; Don Buller; Kyle Siesser
Subject: RE: Holmberg GC 001A - Request for extension

Cory,

This additional excavation and sampling is scheduled for Tuesday, 10/6/20, at 9:00 AM.

Thank you,

Steve Moskal
Environmental Coordinator
BP America Production Co.
bpX energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179
steven.moskal@bpx.com

bpx energy

Steven Moskal

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, June 3, 2020 7:56 AM
To: Steven Moskal
Cc: Blagg, Jefferey
Subject: RE: Holmberg GC 001A Follow Up Sampling

Follow Up Flag: Follow up
Flag Status: Completed

Steve,

OCD approves the approved Sampling plan with the following condition of approval. Any area that are wet or otherwise show signs of a previous release need to be sampled via grab sample.

Please include this approval in your Final C-141 as no other approval will be sent to you.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Steven Moskal <Steven.Moskal@BPX.COM>
Sent: Monday, June 1, 2020 3:26 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Blagg, Jefferey <jeffcblagg@aol.com>
Subject: [EXT] Holmberg GC 001A Follow Up Sampling

Cory,

As discussed, the subject location had a release associated with an oil hauling truck which had a hose failure on January 15, 2018. However, the sampling was not adequate post excavation. The excavation varied from 1.5' on the north half to 4.5 deep on the south end. The approximate area of release is depicted on the attached figure labeled 1.15.18. Incident #NVF1802648183.

I propose to segment the release are, approximately 1,000 sq ft, into 4 areas, areas 1-4 on the attached figure labeled 6.1.20. The sampling will be performed with a hand auger or backhoe where access allows. One, five-point, composite sample will be collected from each area and will include the areas outside the estimated excavation area to account for sidewall. For area 1 and 4, this will include 3 points form sidewalls and two from the base. For areas 2 and 3, this will include 2 sidewalls (north and south) and 3 base to total 5 points for each sample area.

Let me know your thoughts.

Thank you,

Steve Moskal
Environmental Coordinator
BP America Production Co.
bpx energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179
steven.moskal@bpx.com

bpx energy

SITING CRITERIA

DOCUMENTATION

New Mexico Office of the State Engineer

Active & Inactive Points of Diversion

(with Well Drill Dates & Depths)

(R=POD has been replaced and no longer serves this file, C=the file is closed) (quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest) (NAD83 UTM in meters) (in feet)

WR File Nbr	Sub basin	Use	Diversion (acre ft per annum)	County	POD Number	Well Tag	Code Grant	Source	q 64	q 16	q 4	Sec	Tws	Rng	X	Y	Start Date	Finish Date	Depth Well	Depth Water
SJ 00153	SJAR	DOM	3	SJ	SJ 00153			Shallow	1	4		28	32N	10W	243109	4093718*	02/19/1977	02/23/1977	23	14

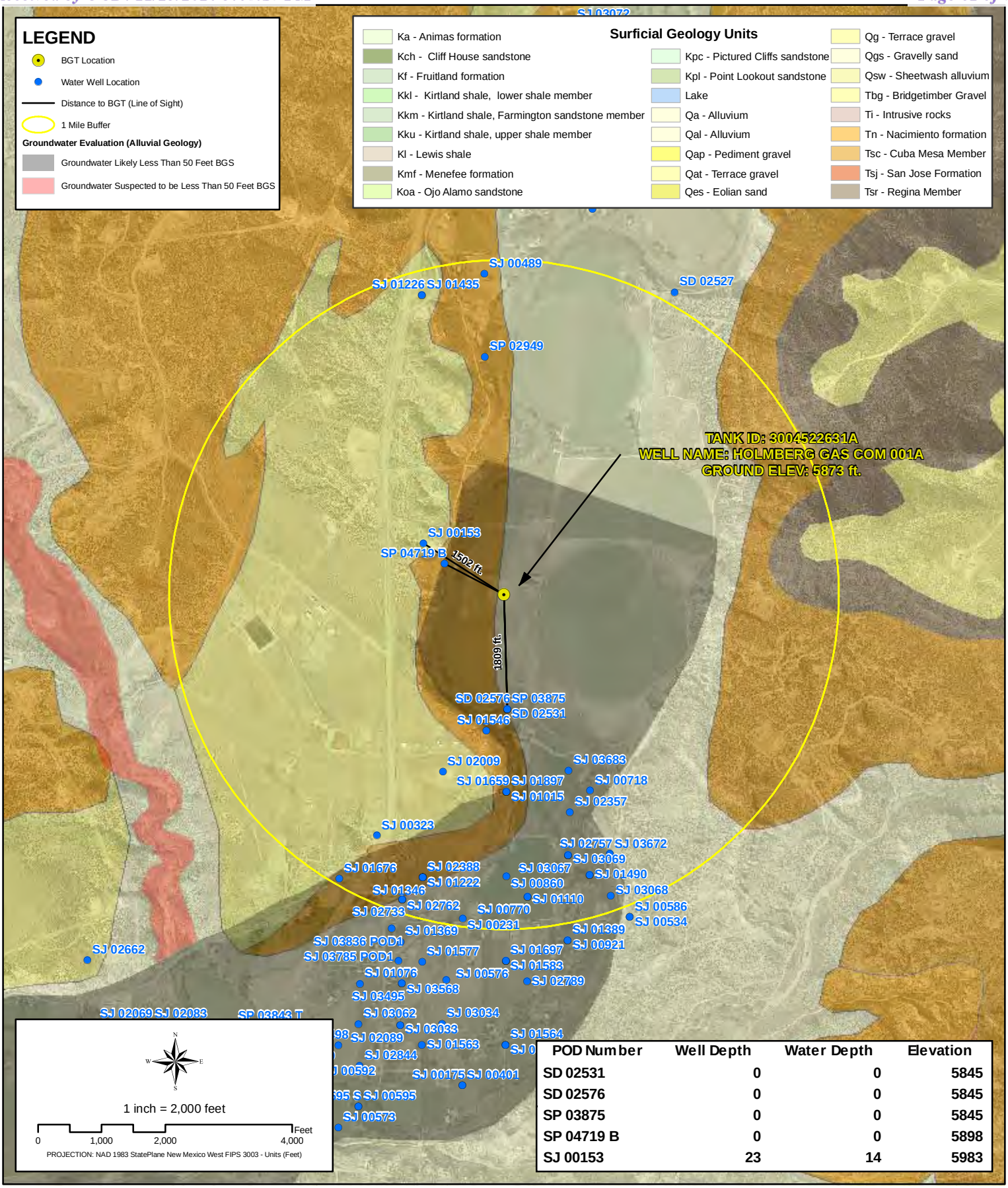
Record Count: 1

POD Search:

POD Number: SJ 00153

Sorted by: File Number

***UTM location was derived from PLSS - see Help**



POD Number	Well Depth	Water Depth	Elevation
SD 02531	0	0	5845
SD 02576	0	0	5845
SP 03875	0	0	5845
SP 04719 B	0	0	5898
SJ 00153	23	14	5983

Creation Date: 5/27/2010
Created by: PRW
File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\Sector3_Baseb.mxd
Reviewed by: AGH

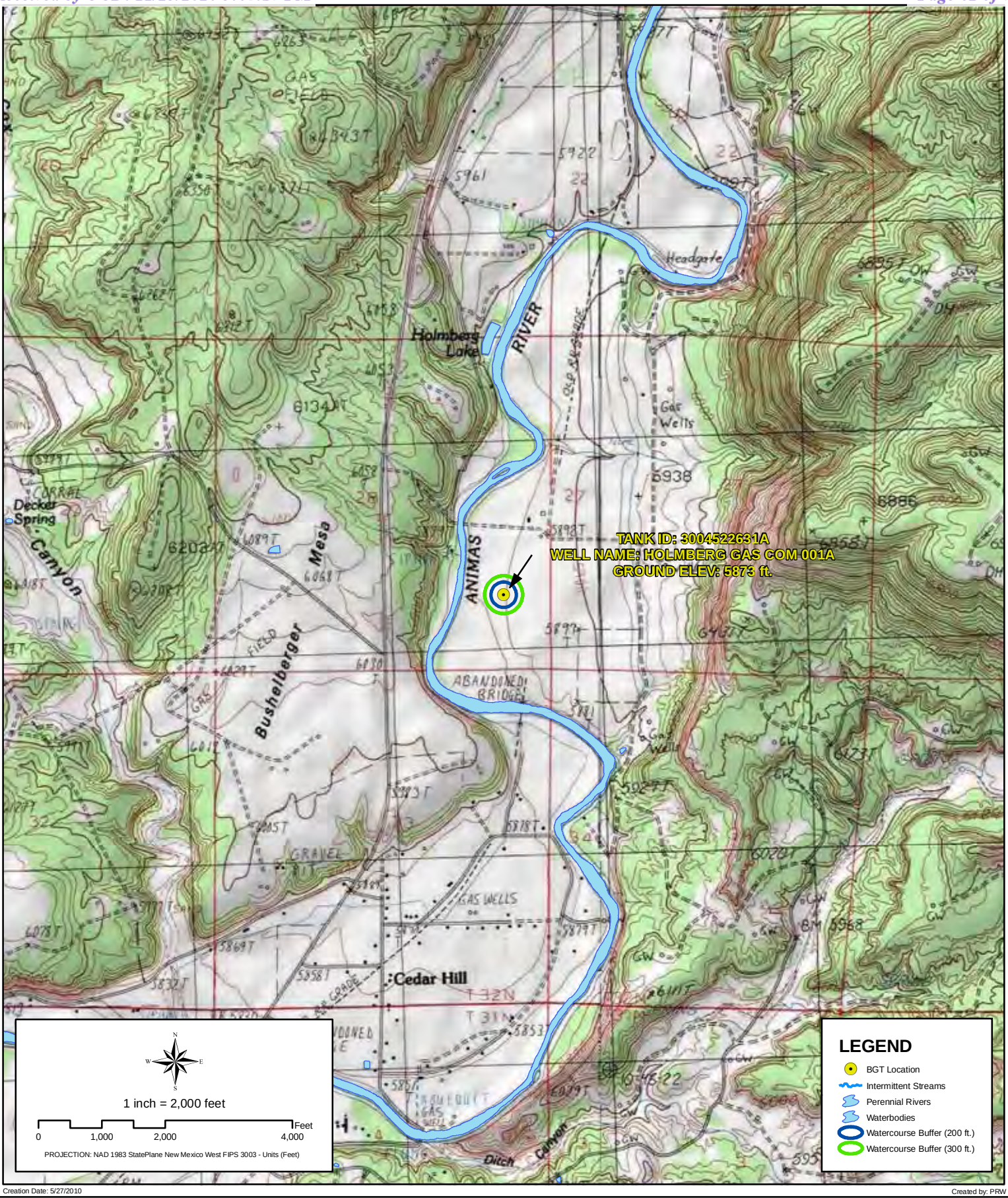
GROUNDWATER LESS THAN 50 FT.

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 1



Creation Date: 5/27/2010 Created by: PRW

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

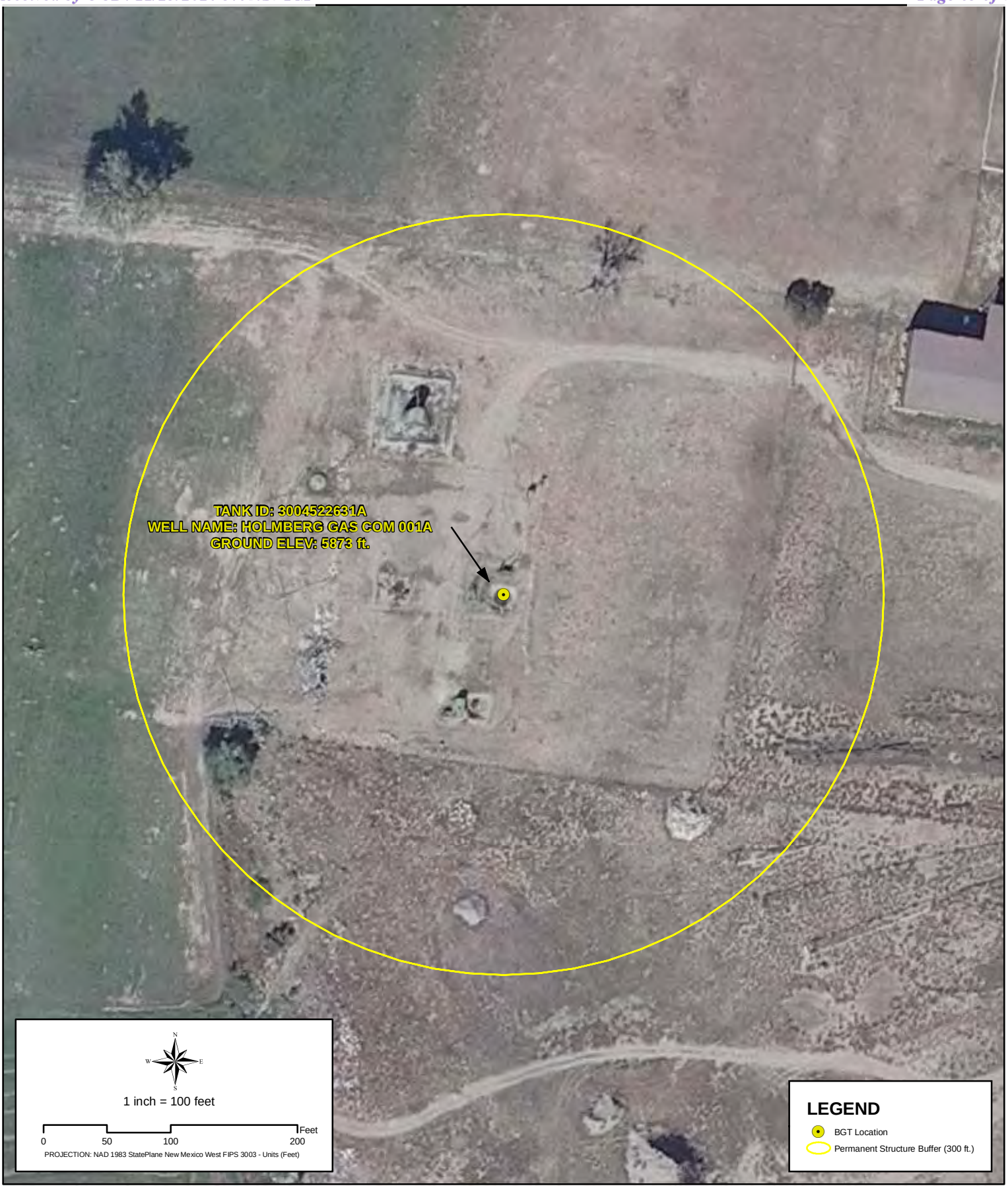
PROXIMITY TO WATERCOURSES

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 2



Creation Date: 5/27/2010 Created by: PRW

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

PROXIMITY TO PERMANENT STRUCTURE

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 3

Creation Date: 5/27/2010 Created by: PRW

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

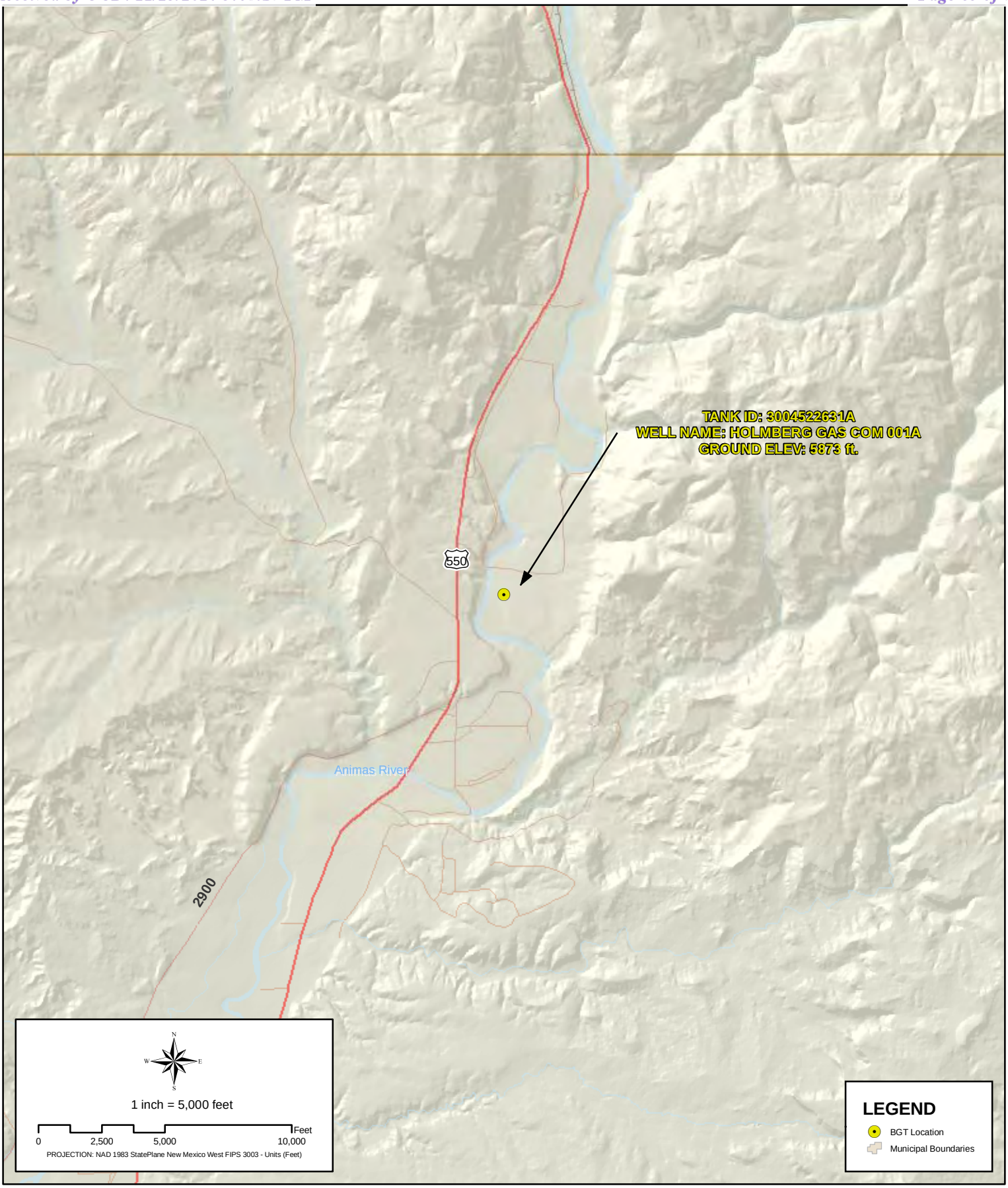
PROXIMITY TO WATER WELLS

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 4



Creation Date: 5/27/2010 Created by: PRW

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

PROXIMITY TO MUNICIPAL BOUNDARY

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 5

Creation Date: 5/27/2010
Created by: PRW
File Path:X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd
Reviewed by: AGH

PROXIMITY TO WETLANDS

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M. NM23

FIGURE 6

Creation Date: 5/27/2010 Created by: EBB

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

PROXIMITY TO SUBSURFACE MINES

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, P.M.NM23

FIGURE 7

Creation Date: 5/27/2010 Created by: PRW

File Path: X:\BP\LTE_Inspections\FAIL\Sector_3\MXDs\3004522631A.mxd Reviewed by: AGH

PROXIMITY TO FLOODPLAIN

WELL NAME: HOLMBERG GAS COM 001A

API NUMBER: 3004522631 TANK ID: 3004522631A

SECTION 28, TOWNSHIP 32.0N, RANGE 10W, 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 Arizonia. 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.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 11298

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 11298
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	9/13/2022