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SR - 461

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413 Phone: (505)632-1199 Fax: (505)632-3903

January 30, 2008

Mr. Glenn Von Gonten, Hydrologist New Mexico Oil Conservation Division-NMOCD Environmental Bureau 1220 St. Francis Drive Santa Fe, New Mexico 87505

RE: REQUEST FOR PERMANENT CLOSURE BP America Production Company (formerly Amoco Production Co. & BP Amoco) Groundwater Monitoring Report Caneple GC B # 1, Unit P, Sec. 13, T31N, R11W, NMPM 30-045-ことイン San Juan County, New Mexico

NMOCD Administrative/Environmental Order #: NONE 3R-4(e)

Dear Mr. Von Gonten:

BP America Production Company (**BP**) has retained Blagg Engineering, Inc. (**BEI**) to conduct environmental monitoring of groundwater at the Caneple GC B # 1.

BP has followed its NMOCD approved groundwater management plan and is requesting permanent closure for this site.

If you have any questions concerning the enclosed documentation, please contact either myself or Jeffrey C. Blagg at (505) 632-1199. Thank you for your cooperation and assistance.

Respectfully submitted: *Blagg Engineering, Inc.*

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Nelson J. Velez Staff Geologist

Attachment: Groundwater Report (2 copies)

cc: Mr. Brandon Powell, Environmental Specialist, NMOCD District III Office, Aztec, NM Mr. Larry Schlotterback, Environmental Coordinator, BP, Farmington, NM (without lab report)

BP AMERICA PRODUCTION COMPANY Caneple GC B #1 (30-045-22454 Se/4 Se/4, Sec. 13, T31N, R11W

RIBENOUR GC 1A (30-045-20953)

Historical Information:

Pit Closure Dates: Monitor Well Installation Dates: Reclamation Procedures: Monitor Well Sampling Dates: Feb / March 1996 Sept. / Oct. 2006 Excavation (Feb. 1996) 10/12/06; 12/21/06; 02/21/07; 05/16/07

Groundwater was encountered at a depth of approximately 8 feet below surface grade during excavation of impacted soils from a separator and an unknown type pit in February/March 1996 (documentation attached). The excavation perimeter was measured at approximately 50 X 100 X 10 feet depth. Approximately 1,850 cubic yards of soils were removed and transported to BP's (formerly called Amoco Production Company) Cahn GC #1S well site (Unit L, Sec. 33, T32N, R10W). Two (2) test holes adjacent to the excavation were sampled on February 19, 1996 and tested for benzene, toluene, ethylbenzene, and total xylenes (**BTEX**) per US EPA method 8020. The groundwater within the excavation perimeter was pumped via water hauling trucks and disposed at an approved facility. Afterwards, the exposed groundwater was sampled on February 23, 1996. A subsequent sampling of the groundwater was conducted on February 26, 1996. Upon receipt of the first laboratory results received, the New Mexico Oil Conservation Division (**NMOCD**) was notified with letter dated March 5, 1996 of the groundwater impact (attached). Resampling of the groundwater in three (3) additional events was conducted at later dates in February and March, 1996. The BTEX results of the groundwater sampling from the excavation and adjacent test holes are as follows;

Sample ID	Date	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Total Xylenes (ppb)	
Pit Water	02/23/96	23.3	14.0	61.1	600	
Pit Water	02/26/96	15.7	5.8	24.0	463.1	
Pit Water	02/29/96	13.8	5.11	6.93	659.8	
Pit Water	03/06/96	11.0	13.3	11.7	700.5	
Pit Water	03/11/96	9.6	7.9	17.7	448.5	
TH2 @ 8'	02/19/96	ND	ND	ND	3.18	
TH3 @ 8'	02/19/96	1.14	0.99	ND	ND	
NMWQCC regulatory standards		10	750	750	620	

Note: NMWQCC = New Mexico Water Quality Control Commission, ppb = parts per billion, ND = not detectable at reported limits.

Groundwater Investigation and Soil Lithology:

Groundwater monitor wells were installed in September/October 2006 to test groundwater quality. Boring logs for all three (3) monitor wells along with well completion information are contained within this report. There does not appear to be any known receptors ever impacted by the previous discovery of impacted soil and/or groundwater. In addition, there does not appear to be any physical evidence to indicate that a nearby irrigation ditch immediately down gradient of the excavation (see Figure 1) has ever been impacted as well.

Soil lithology at the site consists of primarily sand and gravel of varying color and size.

Groundwater Monitor Well Sampling Procedures:

Groundwater samples were collected from site monitor wells following US EPA: SW-846 protocol. After well development, samples were collected with new disposable bailers, placed into laboratory supplied containers with appropriate preservative and stored in an ice chest for express delivery to a qualified laboratory for testing. Analytical testing included BTEX by US EPA Method 8021B and general water chemistry.

Waste generated during monitor well sampling and development was disposed of utilizing the separator tank pit located on the well site.

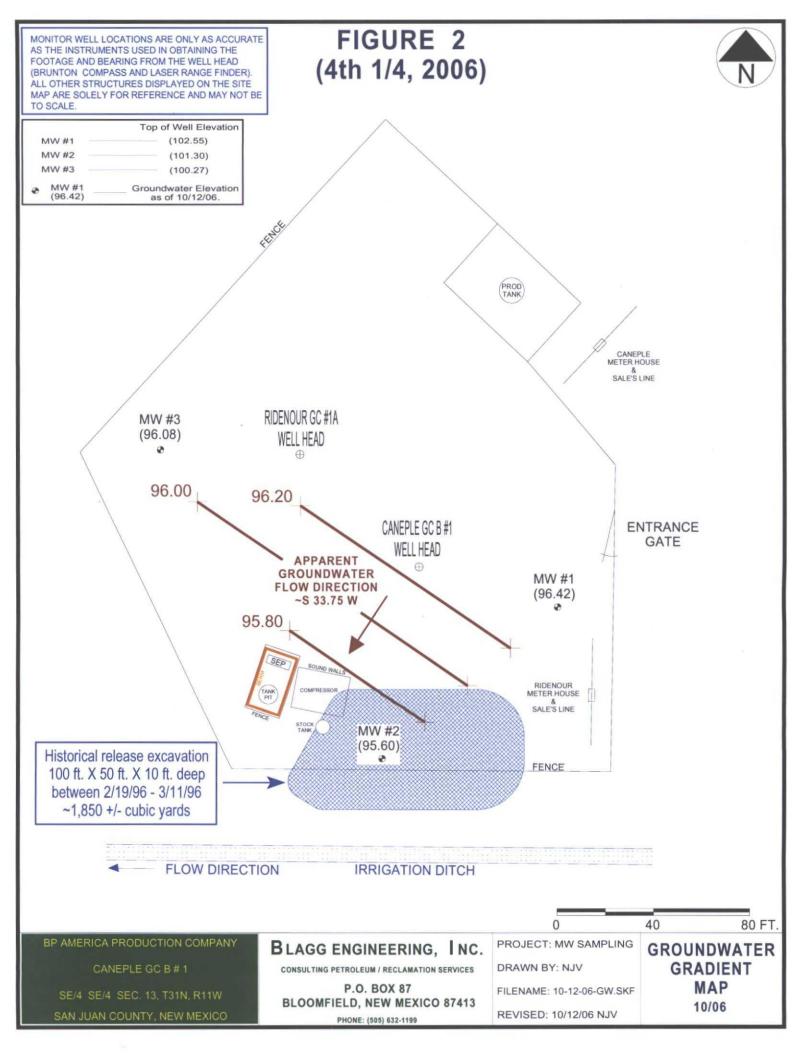
Groundwater Quality & Flow Direction Information:

Quarterly groundwater monitor well sampling was initiated in October, 2006. Summary of laboratory BTEX analytical results are included in the table on the following pages. The data indicates all BTEX constituents tested below New Mexico Water Quality Control Commission (NMWQCC) standards for four (4) consecutive sampling events within the source area.

Groundwater contour maps of relative water table elevations for all sample events are included (Figures 2 and 5). The general groundwater flow direction has consistently been in a southwest direction.

Summary and Recommendations:

Hydrocarbon impacted soil and groundwater at the site has been remediated via excavation of impacted soils. All site wells meet NMWQCC standards for groundwater. Permanent site closure is recommended. Following approval by the NMOCD, site monitor wells will be abandoned pursuant to the approved BP Ground Water Management Plan.



BP AMERICA PROD. CO. GROUNDWATER LAB RESULTS

SUBMITTED BY BLAGG ENGINEERING, INC.

CANEPLE GC B #1

UNIT P, SEC. 13, T31N, R11W

REVISED DATE: August 3, 2007 FILENAME: (CAN-2Q07.WK4) NJV

								BTEX	BTEX EPA METHOD 8021B (ppb)		
SAMPLE	WELL	D.T.W.	T.D.	TDS	COND.	pН	PRODUCT	Benzene	Toluene	Ethyl	Total
DATE	NAME or No.	_(ft)	(ft)	(<u>mg/L</u>)	umhos		(ft)			Benzene	Xylene
			····	1	1	1		- 		<u></u>	
12-Oct-06	MW #1	6.13	16.50	744	1,000	7.15		ND	<u>ND</u>	ND	ND
12-Oct-06	MW #2	5.70	16.20	2,700	2,800	6.98		6.0	ND	20 ·	97
21-Dec-06	· ·	8.20			1,500	7.27		8.5	ND	17	89
21-Feb-07		8.84			1,100	7.40		5.4	2.0	13	71
16-May-07		6.33			900	7.29		3.5	ND	4.4	36
12-Oct-06	MW #3	4.19	15.00	1,140	1,600	7.03		ND	ND	ND	ND
21-Dec-06		7.00			1,200	7.27		ND	ND		ND_
NMWQCC GROUNDWATER STANDARDS						10	750	750	620		