

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-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or

12386 Proposed Alternative Method Permit or Closure Plan Application

Type of action: Below grade tank registration
 Permit of a pit or proposed alternative method
45-11686 Closure of a pit, below-grade tank, or proposed alternative method
 Modification to an existing permit/or registration
 Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

OIL CONS. DIV DIST. 3

NOV 21 2014

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: BP America Production Company _____ OGRID #: 778 _____
Address: 200 Energy Court, Farmington, NM 87401 _____
Facility or well name: Gallegos Canyon Unit 233 _____
API Number: 3004511686 _____ OCD Permit Number: _____
U/L or Qtr/Qtr M Section 27 Township 28N Range 12W County: San Juan _____
Center of Proposed Design: Latitude 36.62846 Longitude -108.10495 NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
 Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 String-Reinforced
Liner Seams: Welded Factory Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.
 Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank A
Volume: 21.0 _____ bbl Type of fluid: Produced water _____
Tank Construction material: Steel _____
 Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
 Visible sidewalls and liner Visible sidewalls only Other Single walled/Double bottomed; side walls not visible _____
Liner type: Thickness _____ mil HDPE PVC Other _____

4.
 Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.

Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

- Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
- Four foot height, four strands of barbed wire evenly spaced between one and four feet
- Alternate. Please specify _____

6.

Netting: Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- Screen Netting Other _____
- Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC

- 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- Signed in compliance with 19.15.16.8 NMAC

8.

Variations and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

- Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: *The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Yes No
 NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Yes No
 NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Yes No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Yes No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Yes No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

Yes No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

Yes No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

Yes No

- Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. Yes No
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image
- Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. Yes No
 - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site
- Within 100 feet of a wetland. Yes No
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

Temporary Pit Non-low chloride drilling fluid

- Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Yes No
 - Topographic map; Visual inspection (certification) of the proposed site
- Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Yes No
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image
- 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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; Yes No
 - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site
- Within 300 feet of a wetland. Yes No
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

Permanent Pit or Multi-Well Fluid Management Pit

- Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Yes No
 - Topographic map; Visual inspection (certification) of the proposed site
- Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Yes No
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image
- Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. Yes No
 - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site
- Within 500 feet of a wetland. Yes No
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

10. **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

11. **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- A List of wells with approved application for permit to drill associated with the pit.
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12. **Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H₂S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13. **Proposed Closure:** 19.15.17.13 NMAC

Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fluid Management Pit
 Alternative
- Proposed Closure Method: Waste Excavation and Removal
 Waste Removal (Closed-loop systems only)
 On-site Closure Method (Only for temporary pits and closed-loop systems)
 In-place Burial On-site Trench Burial
 Alternative Closure Method

14. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15. **Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> No

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18. **OCD Approval:** Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)

OCD Representative Signature: Jonathan D. Kelly Approval Date: 12/11/2014

Title: Compliance Officer OCD Permit Number: _____

19. **Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC
Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

Closure Completion Date: 10/8/2014

20. **Closure Method:**
 Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)
 If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure for private land only)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.62846 Longitude -108.10495 NAD: 1927 1983

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Jeff Peace Title: Field Environmental Coordinator

Signature:  Date: November 20, 2014

e-mail address: peace.jeffrey@bp.com Telephone: (505) 326-9479

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Gallegos Canyon Unit 233, BGT Tank A (21 bbl)

API No. 3004511686

Unit Letter M, Section 27, T28N, R12W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
Notice is attached.
2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
Notice is attached.
3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
 - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
 - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
 - c. Basin Disposal, Permit NM-01-0005 (Liquids)
 - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
 - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)

- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

- 4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

The BGT was transported to a storage area for sale and re-use.

- 5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

All equipment associated with the BGT has been removed.

- 6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method 21 bbl BGT, Tank A	Release Verification (mg/Kg)	Sample results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	10.6

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
Sampling results indicate no release occurred.
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not within the active process area
The area under the BGT was backfilled with clean soil and is still within the active well area.
10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.
The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.
11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.
12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.
13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
BP will seed the area when the well is plugged and abandoned as part of final reclamation.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.

BP will notify NMOCD when re-vegetation is successful.

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;

- a. proof of closure notification (surface owner and NMOCD)
- b. sampling analytical reports; information required by 19.15.17 NMAC;
- c. disposal facility name and permit number
- d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
- e. site reclamation, photo documentation.

Closure report on C-144 form is included.

16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

District I
1625 N. French Dr., Hobbs, NM 88240
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811 S. First St., Artesia, NM 88210
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State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: BP	Contact: Jeff Peace	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479	
Facility Name: Gallegos Canyon Unit 233	Facility Type: Natural gas well	
Surface Owner: Federal	Mineral Owner: Federal	API No. 3004511686

LOCATION OF RELEASE

Unit Letter M	Section 27	Township 28N	Range 12W	Feet from the 990	North/South Line South	Feet from the 790	East/West Line West	County: San Juan
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Latitude 36.62846 Longitude -108.10495

NATURE OF RELEASE

Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tank - 21 bbl, Tank A	Date and Hour of Occurrence: N/A	Date and Hour of Discovery: N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chlorides below standards. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.* BGT was removed and the area underneath the BGT was sampled. The area under the BGT was backfilled and compacted and is still within the active well area.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Jeff Peace	Approved by Environmental Specialist:	
Title: Field Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: November 20, 2014	Phone: 505-326-9479	

* Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: 3004511686
		TANK ID (if applicable): A & B

FIELD REPORT:

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

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

SITE INFORMATION:		SITE NAME: GCU # 233	
QUAD/UNIT: M	SEC: 27	TWP: 28N	RNG: 12W PM: NM CNTY: SJ ST: NM
1/4 - 1/4 / FOOTAGE: 990'S / 790'W		SW/SW LEASE TYPE: <input checked="" type="checkbox"/> FEDERAL / <input type="checkbox"/> STATE / <input type="checkbox"/> FEE / <input type="checkbox"/> INDIAN	
LEASE #: SF078828A	PROD. FORMATION: PC	CONTRACTOR: STRIKE MBF - D. HAGA	

DATE STARTED: 10/06/14
DATE FINISHED:
ENVIRONMENTAL SPECIALIST(S): JCB

REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.: 36.62873 X 108.10543	GL ELEV.: 5,745'
1) 21 BGT (SW/DB) - A	GPS COORD.: 36.62846 X 108.10495	DISTANCE/BEARING FROM W.H.: 152', N58E
2) 45 BGT (SW/DB) - B	GPS COORD.: 36.62898 X 108.10494	DISTANCE/BEARING FROM W.H.: 160', S48E
3) _____	GPS COORD.: _____	DISTANCE/BEARING FROM W.H.: _____
4) _____	GPS COORD.: _____	DISTANCE/BEARING FROM W.H.: _____

SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: ENVIROTECH	OVM READING (ppm)
1) SAMPLE ID: 21 BGT 5-pt. @ 6'	SAMPLE DATE: 10/06/14 SAMPLE TIME: 1247 LAB ANALYSIS: 418.1/8021B/300.0 (CI)	0.0
2) SAMPLE ID: 45 BGT 5-pt. @ 4'	SAMPLE DATE: 10/06/14 SAMPLE TIME: 1237 LAB ANALYSIS: 418.1/8021B/300.0 (CI)	0.0
3) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	
4) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	

SOIL DESCRIPTION:	SOIL TYPE: <input checked="" type="checkbox"/> SAND / SILTY SAND / <input type="checkbox"/> SILT / <input type="checkbox"/> SILTY CLAY / <input type="checkbox"/> CLAY / <input type="checkbox"/> GRAVEL / OTHER _____
SOIL COLOR: DARK YELLOWISH ORANGE	PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC
COHESION (ALL OTHERS): <input checked="" type="checkbox"/> NON COHESIVE / <input type="checkbox"/> SLIGHTLY COHESIVE / <input type="checkbox"/> COHESIVE / <input type="checkbox"/> HIGHLY COHESIVE	DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD
CONSISTENCY (NON COHESIVE SOILS): <input checked="" type="checkbox"/> LOOSE / <input type="checkbox"/> FIRM / <input type="checkbox"/> DENSE / <input type="checkbox"/> VERY DENSE	HC ODOR DETECTED: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION - _____
MOISTURE: DRY <input checked="" type="checkbox"/> SLIGHTLY MOIST / <input type="checkbox"/> MOIST / <input type="checkbox"/> WET / <input type="checkbox"/> SATURATED / <input type="checkbox"/> SUPER SATURATED	ANY AREAS DISPLAYING WETNESS: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION - _____
SAMPLE TYPE: GRAB <input checked="" type="checkbox"/> COMPOSITE # OF PTS. 5	DISCOLORATION/STAINING OBSERVED: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION - _____

SITE OBSERVATIONS:	LOST INTEGRITY OF EQUIPMENT: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION - _____
APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION: _____	
EQUIPMENT SET OVER RECLAIMED AREA: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> EXPLANATION - _____	
OTHER: _____	

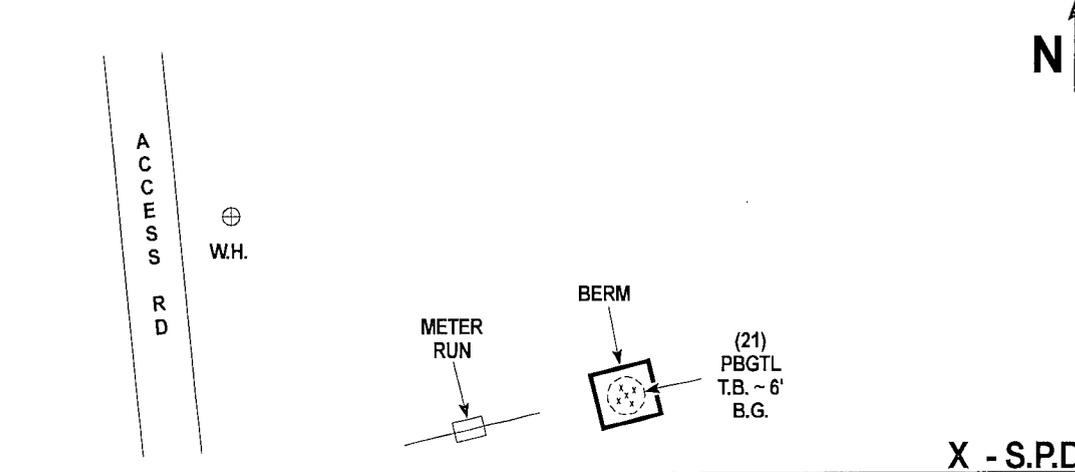
SOIL IMPACT DIMENSION ESTIMATION: **NA** ft. X **NA** ft. X **NA** ft. EXCAVATION ESTIMATION (Cubic Yards): **NA**

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

SITE SKETCH

BGT Located: off on site PLOT PLAN circle: attached

OVM CALIB. READ = 52.6 ppm	RF = 0.52
OVM CALIB. GAS = 100 ppm	
TIME: 6:00 am/pm DATE: 10/06/14	



MISCELL. NOTES	
WO: N15447850	
PO #:	
PK: ZEVH01BGT2	
PJ #: Z2-006Q0	
Permit date(s): 06/14/10	
OC D Appr. date(s): 06/10/14	
Tank ID	OVM = Organic Vapor Meter ppm = parts per million
A	BGT Sidewalls Visible: Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
B	BGT Sidewalls Visible: Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
	BGT Sidewalls Visible: Y / N
Magnetic declination: 10° E	

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

NOTES: _____ ONSITE: **10/06/14**



BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 233 Project Number: 03143-0424 Project Manager: Jeff Blagg	Reported: 08-Oct-14 12:38
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Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
21 BGT 5-pt @ 6'	P410023-01A	Soil	10/06/14	10/06/14	Glass Jar, 4 oz.
45 BGT 5-pt @ 4'	P410023-02A	Soil	10/06/14	10/06/14	Glass Jar, 4 oz.

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 233 Project Number: 03143-0424 Project Manager: Jeff Blagg	Reported: 08-Oct-14 12:38
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21 BGT 5-pt @ 6'
P410023-01 (Solid)

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								
Volatile Organics by EPA 8021										
Benzene	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
Toluene	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
Ethylbenzene	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
p,m-Xylene	ND	0.20		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
o-Xylene	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
Total Xylenes	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
Total BTEX	ND	0.10		mg/kg	1	1441013	10/07/14	10/07/14	EPA 8021B	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		<i>104 %</i>		<i>50-150</i>		<i>1441013</i>	<i>10/07/14</i>	<i>10/07/14</i>	<i>EPA 8021B</i>	
Total Petroleum Hydrocarbons by 418.1										
Total Petroleum Hydrocarbons	ND	34.9		mg/kg	1	1441018	10/07/14	10/07/14	EPA 418.1	
Cation/Anion Analysis										
Chloride	10.6	9.82		mg/kg	1	1441014	10/07/14	10/07/14	EPA 300.0	

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Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	RPD	RPD Limit	Notes
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Batch 1441013 - Purge and Trap EPA 5030A

Blank (1441013-BLK1)

Prepared & Analyzed: 07-Oct-14

Benzene	ND	0.10	mg/kg						
Toluene	ND	0.10	"						
Ethylbenzene	ND	0.10	"						
p,m-Xylene	ND	0.20	"						
o-Xylene	ND	0.10	"						
Total Xylenes	ND	0.10	"						
Total BTEX	ND	0.10	"						

Surrogate: 4-Bromochlorobenzene-PID	0.396		"	0.399		99.3		50-150	
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LCS (1441013-BS1)

Prepared & Analyzed: 07-Oct-14

Benzene	18.7	0.10	mg/kg	19.9		93.8		75-125	
Toluene	18.8	0.10	"	19.9		94.2		70-125	
Ethylbenzene	18.8	0.10	"	19.9		94.5		75-125	
p,m-Xylene	38.1	0.20	"	39.9		95.6		80-125	
o-Xylene	18.7	0.10	"	19.9		93.6		75-125	

Surrogate: 4-Bromochlorobenzene-PID	0.394		"	0.399		98.7		50-150	
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Matrix Spike (1441013-MS1)

Source: P410022-01

Prepared & Analyzed: 07-Oct-14

Benzene	19.7	0.10	mg/kg	20.0	ND	98.5		75-125	
Toluene	19.7	0.10	"	20.0	ND	99.0		70-125	
Ethylbenzene	19.8	0.10	"	20.0	ND	99.1		75-125	
p,m-Xylene	40.1	0.20	"	39.9	ND	100		80-125	
o-Xylene	19.7	0.10	"	20.0	ND	98.9		75-125	

Surrogate: 4-Bromochlorobenzene-PID	0.396		"	0.399		99.3		50-150	
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Matrix Spike Dup (1441013-MSD1)

Source: P410022-01

Prepared & Analyzed: 07-Oct-14

Benzene	20.1	0.10	mg/kg	20.0	ND	101	75-125	2.39	15
Toluene	20.2	0.10	"	20.0	ND	101	70-125	2.33	15
Ethylbenzene	20.3	0.10	"	20.0	ND	101	75-125	2.46	15
p,m-Xylene	41.1	0.20	"	40.0	ND	103	80-125	2.47	15
o-Xylene	20.2	0.10	"	20.0	ND	101	75-125	2.44	15

Surrogate: 4-Bromochlorobenzene-PID	0.398		"	0.400		99.7		50-150	
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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 233 Project Number: 03143-0424 Project Manager: Jeff Blagg	Reported: 08-Oct-14 12:38
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Total Petroleum Hydrocarbons by 418.1 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1441018 - 418 Freon Extraction										
Blank (1441018-BLK1)					Prepared & Analyzed: 07-Oct-14					
Total Petroleum Hydrocarbons	ND	35.0	mg/kg							
Duplicate (1441018-DUP1)					Source: P410023-01 Prepared & Analyzed: 07-Oct-14					
Total Petroleum Hydrocarbons	ND	34.9	mg/kg		ND				30	
Matrix Spike (1441018-MS1)					Source: P410023-01 Prepared & Analyzed: 07-Oct-14					
Total Petroleum Hydrocarbons	1800	35.0	mg/kg	2020	ND	89.1	80-120			

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 233 Project Number: 03143-0424 Project Manager: Jeff Blagg	Reported: 08-Oct-14 12:38
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Cation/Anion Analysis - Quality Control
Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1441014 - Anion Extraction EPA 300.0										
Blank (1441014-BLK1)				Prepared & Analyzed: 07-Oct-14						
Chloride	ND	9.90	mg/kg							
LCS (1441014-BS1)				Prepared & Analyzed: 07-Oct-14						
Chloride	480	9.97	mg/kg	499		96.3	90-110			
Matrix Spike (1441014-MS1)				Source: P410022-01		Prepared & Analyzed: 07-Oct-14				
Chloride	502	9.86	mg/kg	493	22.2	97.4	80-120			
Matrix Spike Dup (1441014-MSD1)				Source: P410022-01		Prepared & Analyzed: 07-Oct-14				
Chloride	497	9.82	mg/kg	491	22.2	96.7	80-120	1.13	20	

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BP America Production Co.
PO Box 22024
Tulsa OK, 74121-2024

Project Name: GCU 233
Project Number: 03143-0424
Project Manager: Jeff Blagg

Reported:
08-Oct-14 12:38

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

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CHAIN OF CUSTODY RECORD

17854

Client: BP America	Project Name / Location: GCU 233	ANALYSIS / PARAMETERS:														
Email results to: jeffcblagg @ AOL.com Peace.jeffrey @ BP.com	Sampler Name: J. Blagg	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	PCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
Client Phone No.: 505-320-1103	Client No.: 03143-0424															

Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers	Preservative		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	PCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact	
					HNO ₃	HCl															
21 BGT 5-pe @ 6	10/6/14	1237	P410023-01	1 x 4 gal				X							X	X			Y	Y	
45 BGT 5-pe @ 4	11	1247	P410023-02	11				X							X	X			Y	Y	

RUSH ASAP
BILL BP

Relinquished by: (Signature) <i>J. Blagg</i>	Date 10/6/14	Time 1558	Received by: (Signature) <i>[Signature]</i>	Date 10/6/14	Time 1558
Relinquished by: (Signature)			Received by: (Signature)		
Sample Matrix Soil <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Aqueous <input type="checkbox"/> Other <input type="checkbox"/>					

Sample(s) dropped off after hours to secure drop off area.

11.8 10.3

5795 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301 • laboratory@envirotech-inc.com

BP America Production Company
200 Energy Court
Farmington, NM 87401
Phone: (505) 326-9200

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US

July 29, 2014

New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

GALLEGOS CANYON UNIT 233
API 30-045-11686
(G) Section 27- T28N - R12W
San Juan County, New Mexico

Dear Mr. Cory Smith:

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 45 bbl BGT and a 21 bbl BGT that will no longer be operational at this well site.

Should you have any questions, please feel free to contact BP at our Farmington office.

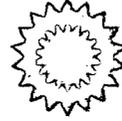
Sincerely,



Jeff Peace
BP Field Environmental Advisor

(505) 326-9479

bp



BP America Production Company
200 Energy Court
Farmington, NM 87401
Phone: (505) 326-9200

July 29, 2014

Bureau of Land Management
Mark Kelly
6251 College Blvd Suite A
Farmington, NM 87402

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Re: Notification of plans to close/remove a below grade tank
Well Name: GALLEGOS CANYON UNIT 233
API #: 3004511686

Dear Mr. Kelly,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) is required to notify the surface owner of BP's plans to close/remove a below grade tank. BP wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about September 12, 2014. If there aren't any unforeseen problems, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

Unless you have questions about this notice, there is no need to respond to this letter. If you do have any questions or concerns, please contact me at 505-326-9214

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Van Riper". The signature is written in a cursive, somewhat stylized font.

Jerry Van Riper
Surface Land Negotiator
BP America Production Company

