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

OIL CONS. DIV DIST. 3
JAN 07 2015

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 166E	Facility Type: Natural gas well

Surface Owner: Tribal	Mineral Owner: Federal	API No. 3004524429

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County: San Juan
E	34	28N	12W	1,760	North	960	East	

Latitude 36.62140 **Longitude** 108.10439

NATURE OF RELEASE

Type of Release: condensate/oil	Volume of Release: unknown	Volume Recovered: none
Source of Release: below grade tank	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: December 6, 2011; 12:44 PM
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* During removal of the below grade tank (BGT) soil underneath the tank was sampled. Analysis results showed TPH values of 760 ppm by Method 418.1 and 180 ppm by Method 8015B, indicating a release occurred at some time. Impacted soil was excavated and removed.

Describe Area Affected and Cleanup Action Taken.* Impacted soil under the BGT was excavated and removed until remaining soil samples resulted in TPH values of less than 100 ppm TPH, which is the cleanup standard for this site. Approximately 25 cubic yards of impacted soil were removed and transported to a landfarm for treatment. The excavated area was backfilled with clean soil and compacted. Attached are lab analyses, photos of the excavation, and a site map.

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: Jeff Peace	OIL CONSERVATION DIVISION Approved by Environmental Specialist:	
Printed Name: Jeff Peace		
Title: Field Environmental Coordinator	Approval Date: 2/6/15	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached ☐
Date: January 6, 2015 Phone: 505-326-9479		

* Attach Additional Sheets If Necessary

#NCS 1503740403

(12)

BP America Production Company

Gallegos Canyon Unit 166E
(E) Sec 34 – T28N – R12W
API: 30-045-24429
San Juan County, New Mexico

Summary Record of Impacted Soil Remediation

December 6, 2011 — Confirmation sampling conducted of the 95 barrel below-grade tank (**BGT**) following the approved New Mexico Oil Conservation Division's (**NMOCD**) bgt permit closure plan.

December 21, 2011 — Lab report delivered to Blagg Engineering, Inc. (**BEI**). The following table below shows the 2010 NMOCD 19.15.17.13 NMAC (pit rule) closure constituents, testing methods, and standards (release verification). Lab results of the 5 point composite sample collected immediately below bgt bottom are shown in the far right column.

Constituents	Testing Method	Release Verification (mg/Kg)	**95 BGT 5-pt.@ 6' (mg/Kg)**
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	**< 0.049**
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	**< 0.049**
TPH	US EPA Method SW-846 418.1	100	**760**
Chlorides	US EPA Method 300.0 or 4500B	250 or background	**42**

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.**

In addition, it was requested by BEI to analyze the confirmation sample for TPH using US EPA Method 8015B. The results revealed total TPH = 180 mg/Kg, in which gasoline range organics (GRO) < 4.9 mg/Kg and Diesel Range Organics (DRO) = 180 mg/Kg.

October 2, 2014 — Initiated site remediation by excavation with trackhoe. Evaluation of NMOCD's "Guidelines for Remediation of Leaks, Spills and Releases", dated August 13, 1993, for site ranking criteria indicated a closure standard of 100 mg/Kg for TPH based on groundwater depth estimated at less than 50' from the known impacted soil vertical depth. Final dimensions of the excavation was 15 ft. x 15 ft. x 8-8.5 ft. depth.

October 3, 2014 — Preliminary lab report furnished revealed TPH using US EPA Method 8015B < 9.9 mg/Kg from three (3) point composite sample of excavation bottom (sample ID: 3PC-EB @ 8-8.5' (95) and < 10 mg/Kg from four (4) point composite sample of excavation sidewalls (sample ID: 4PC-SW @ 8' (95). Completed backfilling operation after verbally communicating lab results with NMOCD Aztec office. Final dimensions of impacted soil removed and replaced with imported clean soil was 15 ft. x 15 ft. x 2.5 ft. depth or approximately 25 cubic yards.

October 21, 2014 — Final lab report furnished and confirmed preliminary results noted above.

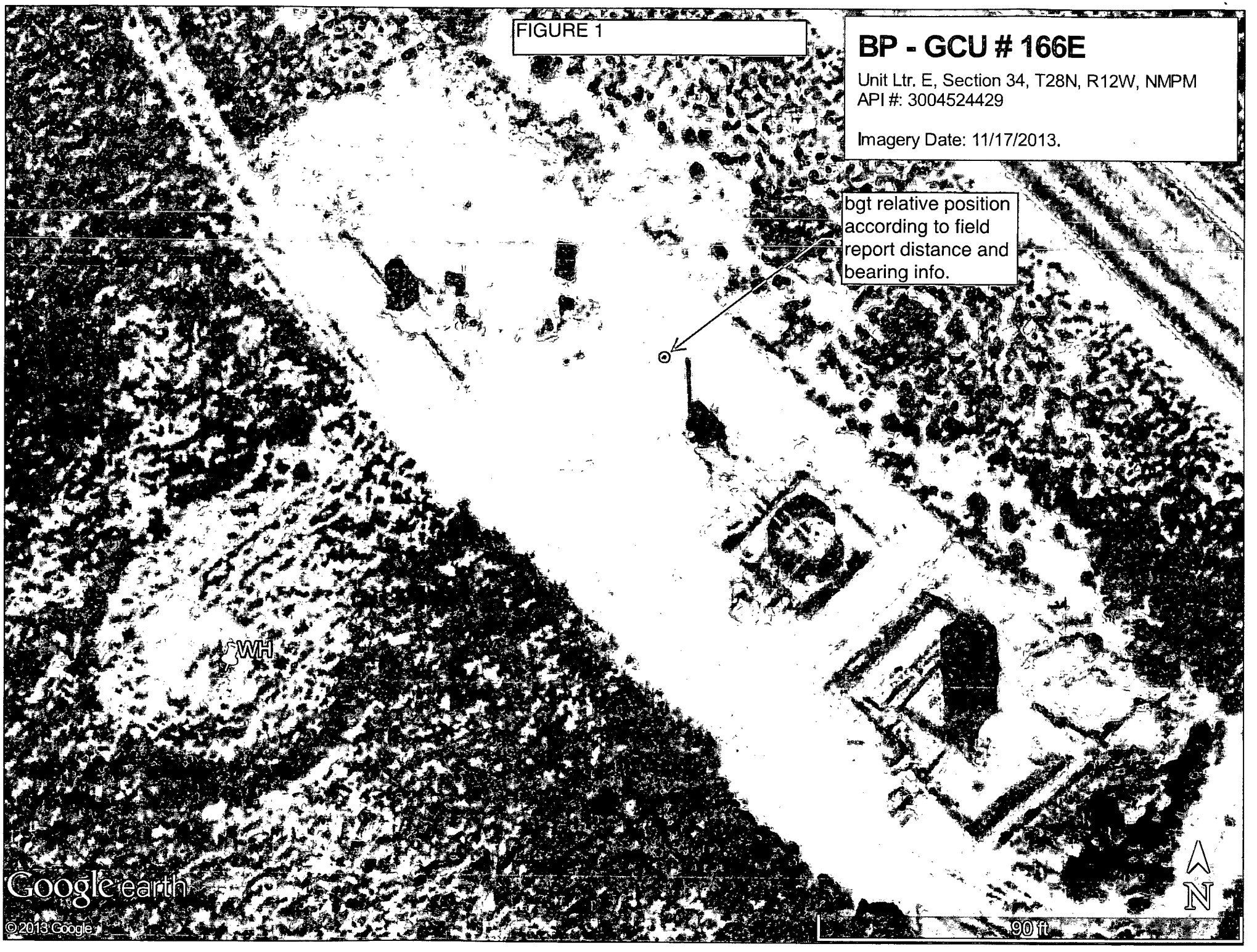
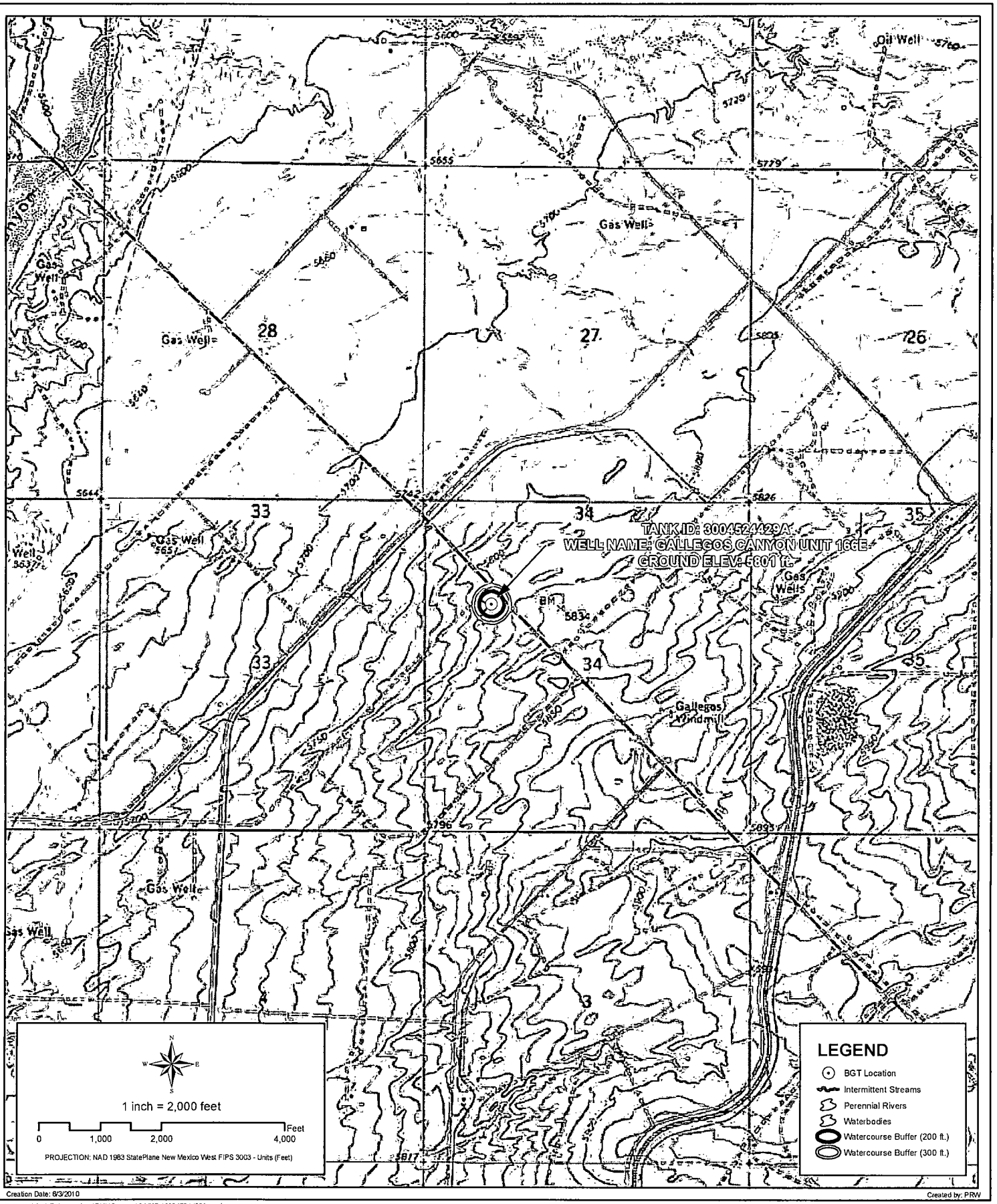


FIGURE 1
BP - GCU # 166E
Unit Ltr. E, Section 34, T28N, R12W, NMPM
API #: 3004524429
Imagery Date: 11/17/2013.
bgt relative position according to field report distance and bearing info.
WH
Google earth
©2013 Google
90 ft
N



Creation Date: 6/3/2010 Created by: PRW

File Path: X:\BPULTE_Inspections\FAIL\Sector_10\MXDs\3004524429A.mxd Reviewed by: AGH

bp

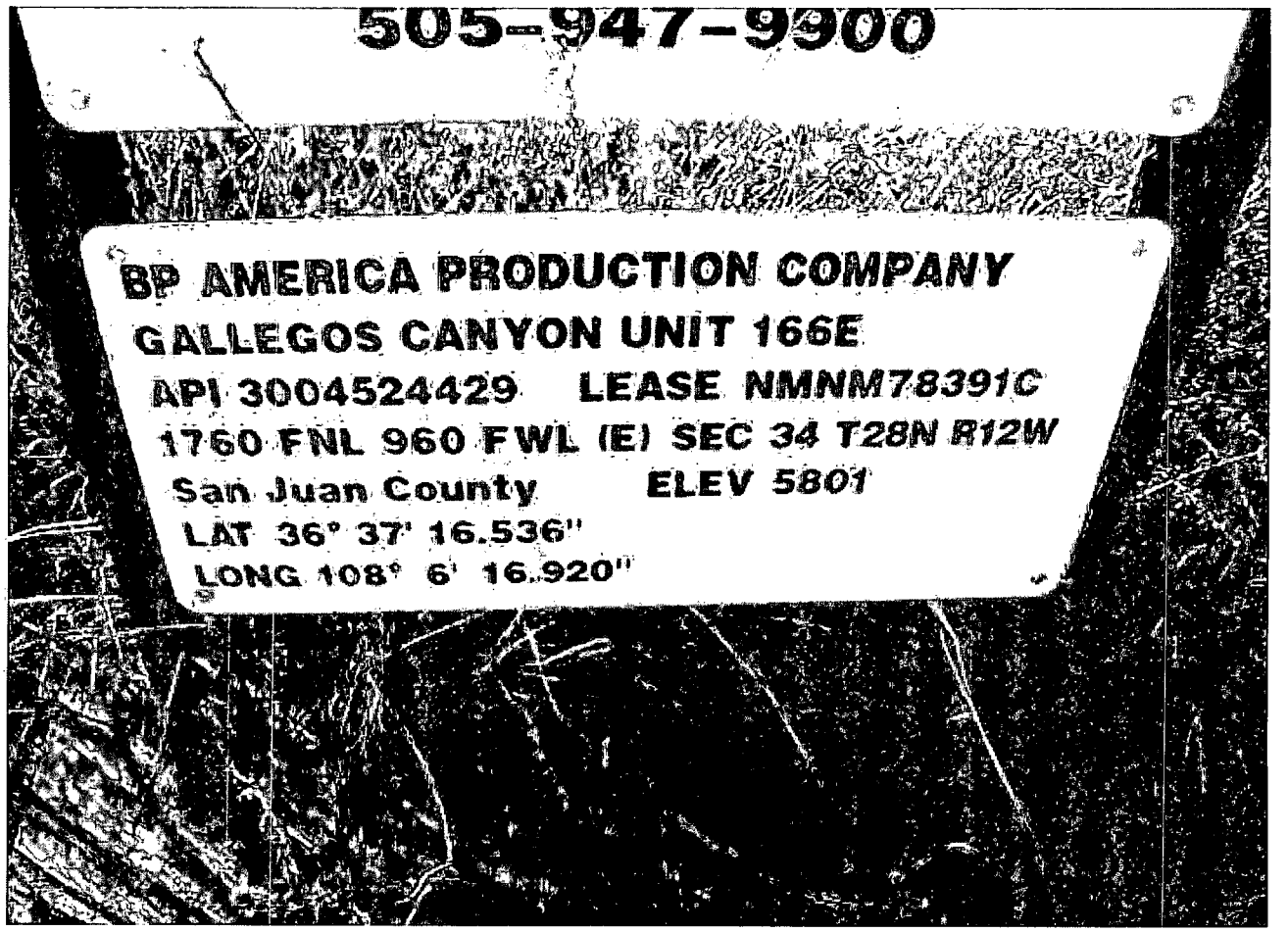
PROXIMITY TO WATERCOURSES

WELL NAME: GALLEGOS CANYON UNIT 166E

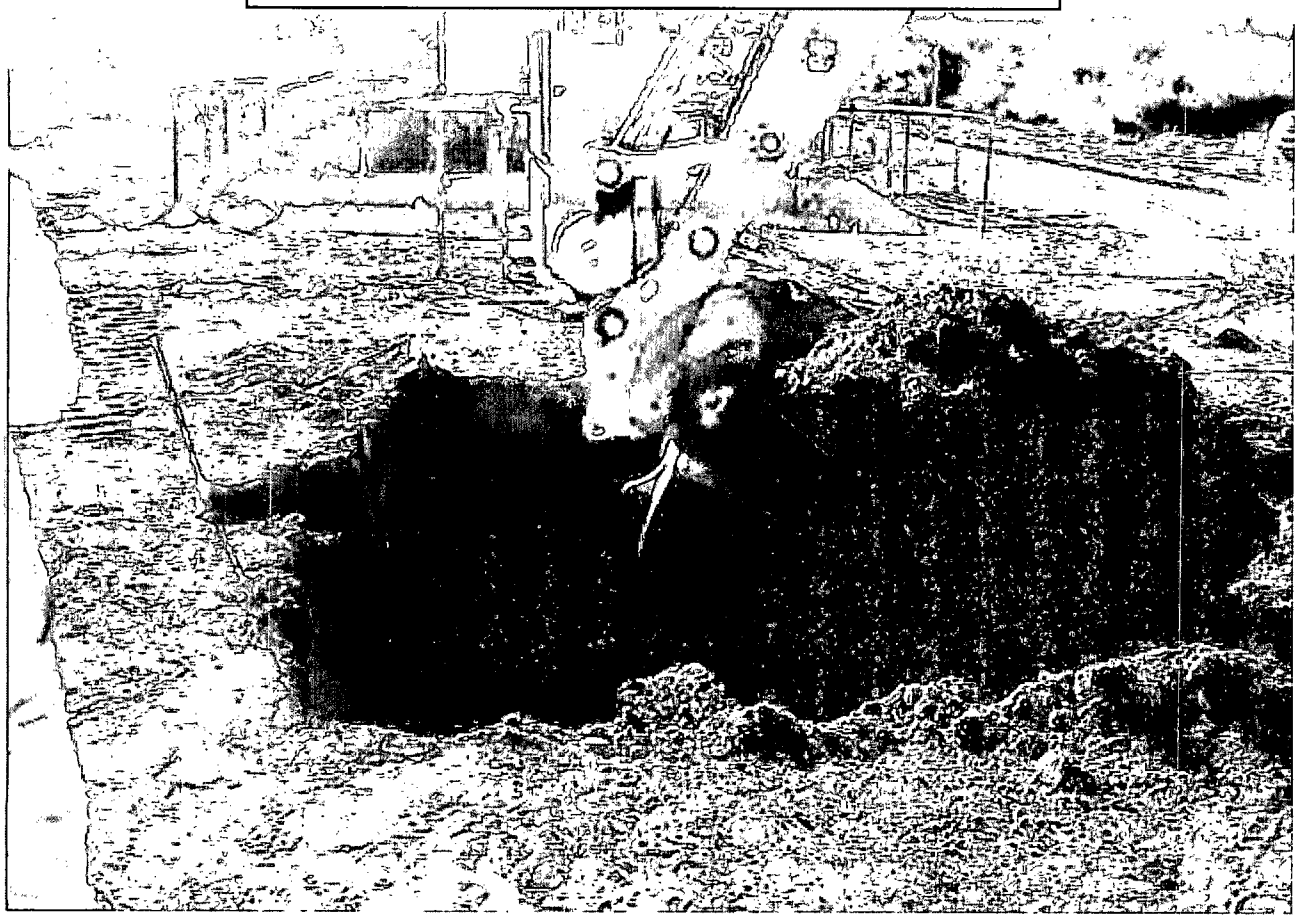
API NUMBER: 3004524429 TANK ID: 3004524429A

SECTION 34, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 2

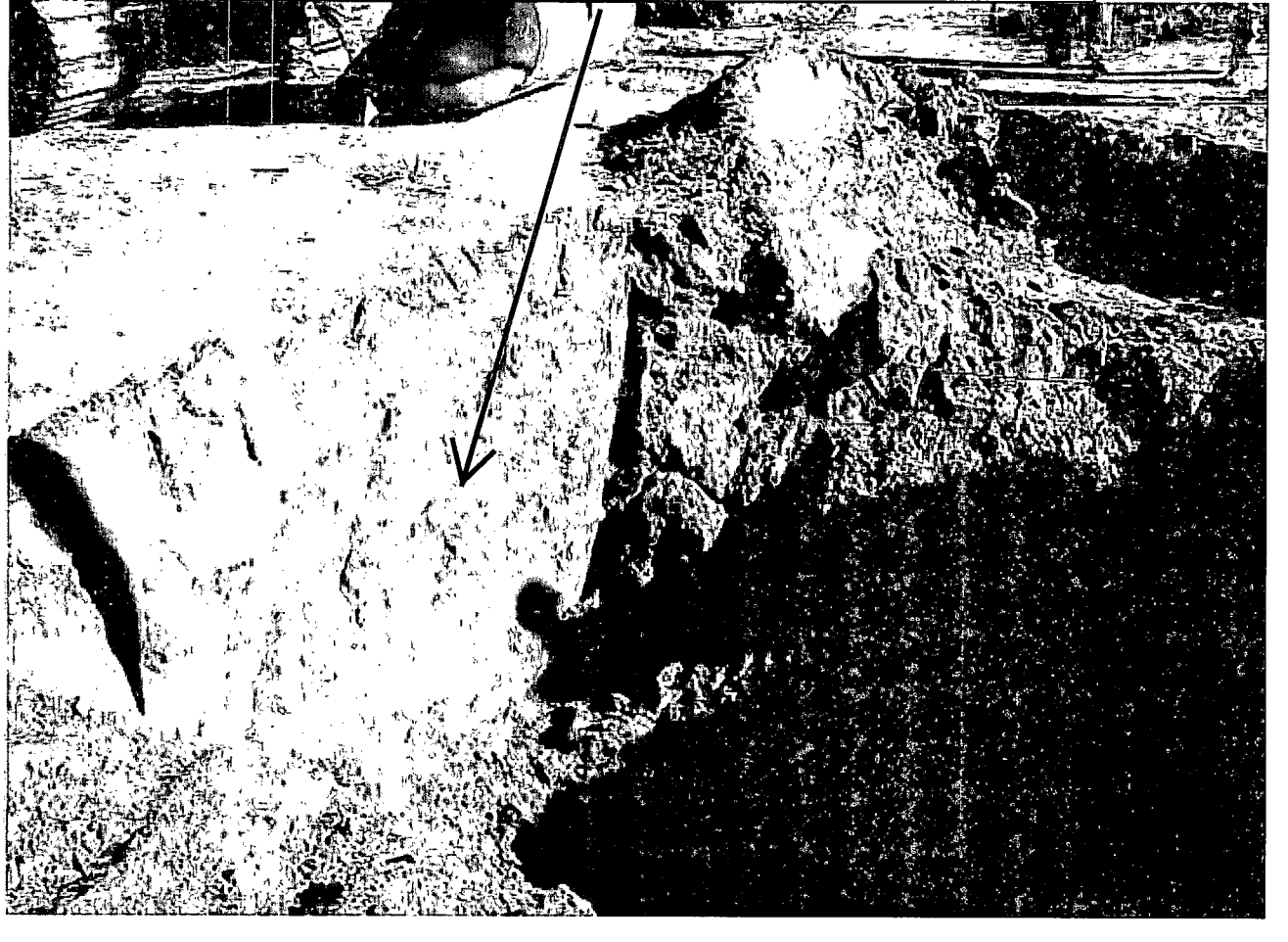


10/02/2014 - Excavation initiated & viewing eastward

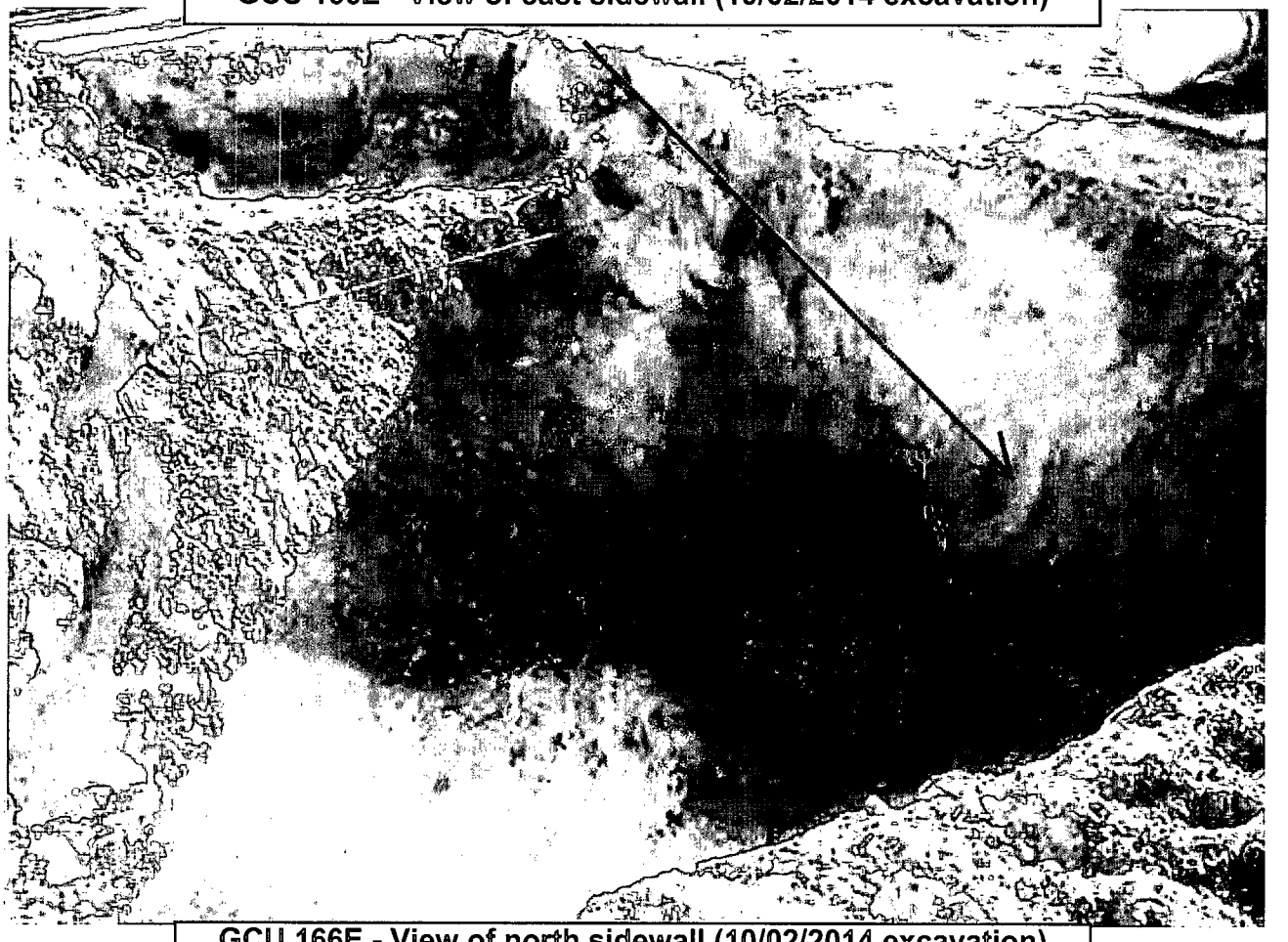


GCU 166E - View of west sidewall (10/02/2014 excavation)

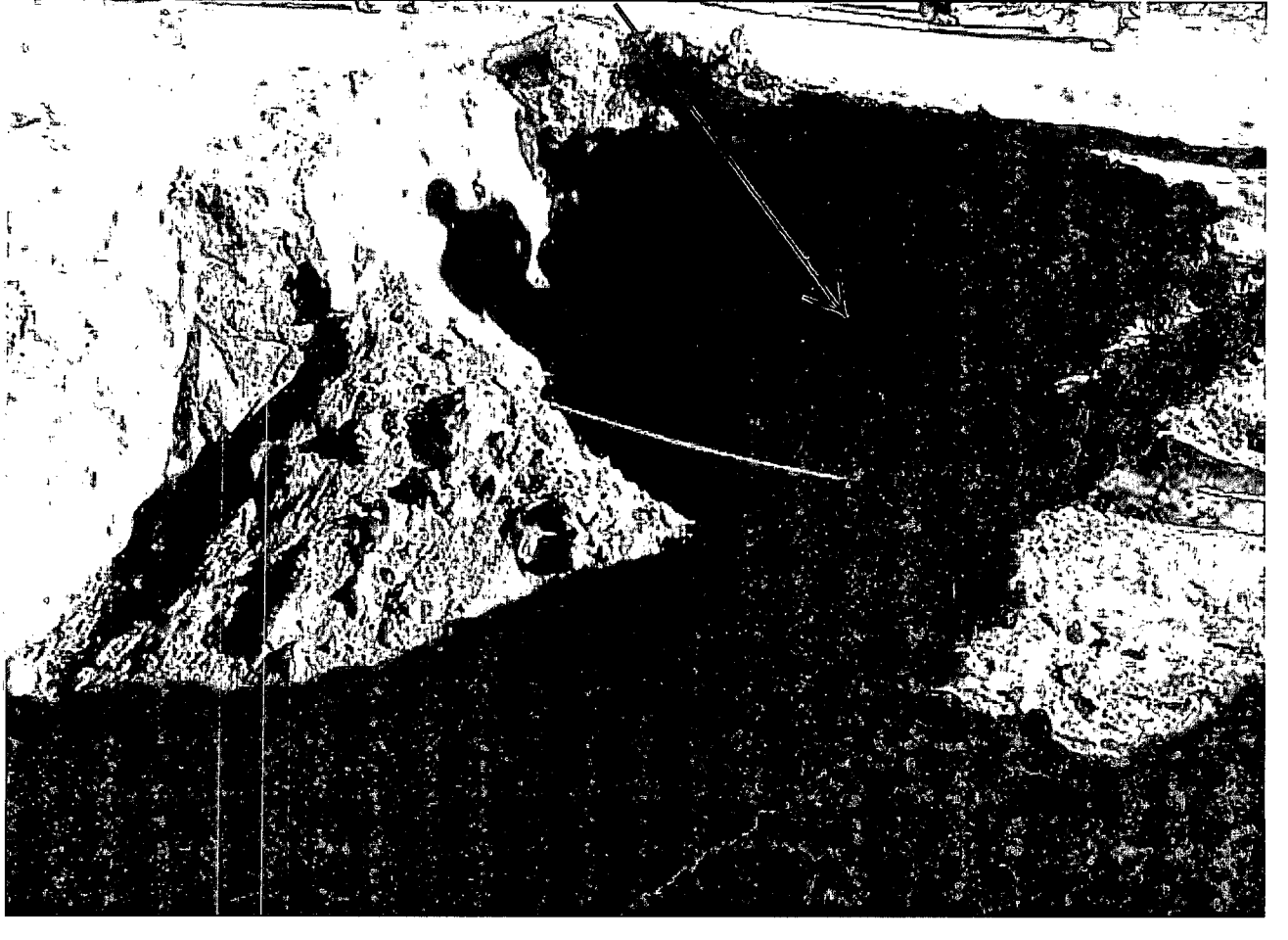
GCU 166E - View of south sidewall (10/02/2014 excavation)



GCU 166E - View of east sidewall (10/02/2014 excavation)



GCU 166E - View of north sidewall (10/02/2014 excavation)



Analytical Report
Lab Order **1410138**
Date Reported: **10/6/2014**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
Project: GCU #166E
Lab ID: 1410138-001 **Matrix:** SOIL

Client Sample ID: 3PC-EB @ 8'-8.5 (95)
Collection Date: 10/2/2014 9:25:00 AM
Received Date: 10/3/2014 7:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS						Analyst: **BCN**	
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	10/3/2014 12:26:32 PM	15696
Surr: DNOP	79.8	57.9-140		%REC	1	10/3/2014 12:26:32 PM	15696
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**	
Gasoline Range Organics (GRO)	ND	3.2		mg/Kg	1	10/3/2014 11:15:13 AM	R21651
Surr: BFB	84.8	80-120		%REC	1	10/3/2014 11:15:13 AM	R21651

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH greater than 2.
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
Project: GCU #166E
Lab ID: 1410138-002 **Matrix:** SOIL

Client Sample ID: 4PC-SW @ 8' (95)
Collection Date: 10/2/2014 9:40:00 AM
Received Date: 10/3/2014 7:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS						Analyst: **BCN**	
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	10/3/2014 12:48:18 PM	15696
Surr: DNOP	80.9	57.9-140		%REC	1	10/3/2014 12:48:18 PM	15696
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**	
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	10/3/2014 7:18:26 PM	R21651
Surr: BFB	88.4	80-120		%REC	1	10/3/2014 7:18:26 PM	R21651

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH greater than 2.
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1410138**

06-Oct-14

Client: Blagg Engineering

Project: GCU #166E

Sample ID: **MB-15696**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **15696**	RunNo: **21649**
Prep Date: **10/3/2014**	Analysis Date: **10/3/2014**	SeqNo: **635349** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	7.9		10.00		79.3	57.9	140			

Sample ID: **LCS-15696**	SampType: **LCS**	TestCode: **EPA Method 8015D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **15696**	RunNo: **21649**
Prep Date: **10/3/2014**	Analysis Date: **10/3/2014**	SeqNo: **635354** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	53	10	50.00	0	107	68.6	130			
Surr: DNOP	4.5		5.000		90.3	57.9	140			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1410138**

06-Oct-14

Client: Blagg Engineering
Project: GCU #166E

Sample ID: **5ML RB**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **PBS**	Batch ID: **R21651**	RunNo: **21651**
Prep Date:	Analysis Date: **10/3/2014**	SeqNo: **635908** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	880		1000		88.3	80	120			

Sample ID: **2.5UG GRO LCS**	SampType: **LCS**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **LCSS**	Batch ID: **R21651**	RunNo: **21651**
Prep Date:	Analysis Date: **10/3/2014**	SeqNo: **635909** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	91.4	65.8	139			
Surr: BFB	1000		1000		101	80	120			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

Sample Log-In Check List

Client Name: BLAGG Work Order Number: 1410138 RcptNo: 1

Received by/date: CM 10/03/14

Logged By: Anne Thorne 10/3/2014 7:40:00 AM Anne Thorne

Completed By: Anne Thorne 10/3/2014 Anne Thorne

Reviewed By: CS 10/3/14

Chain of Custody

1. Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
2. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
3. How was the sample delivered?	Courier		

Log In

4. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
6. Sample(s) in proper container(s)?	Yes ☑	No ☐	
7. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
8. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
9. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
10. VOA vials have zero headspace?	Yes ☐	No ☐	No VOA Vials ☑
11. Were any sample containers received broken?	Yes ☐	No ☑	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
13. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
14. Is it clear what analyses were requested?	Yes ☑	No ☐	
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)

Adjusted? _____

Checked by: _____

Special Handling (if applicable)

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

Person Notified: _____ Date _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

17. Additional remarks:

18. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.6	Good	Yes			

Chain-of-Custody Record

Client: BLAGG ENGR. / BP AMERICA

Mailing Address: P.O. BOX 87
BLOOMFIELD, NM 87413

Phone #: (505) 632-1199

email or Fax#:

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

Accreditation:
☐ NELAP ☐ Other

☐ EDD (Type)

Turn-Around Time:
☐ Standard ☑ Rush SAME DAY

Project Name: GCU # 166E

Project #:

Project Manager: NELSON VELEZ

Sampler: NELSON VELEZ

On Ice: ☒ Yes ☐ No

Sample Temperature: 1.7

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

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.
10/2/14	0925	SOIL	3PC - EB @ 8'-8.5 (95)	4 oz. - 1	Cool	-001
10/2/14	0940	SOIL	4PC - SW @ 8' (95)	4 oz. - 1	Cool	-002

Analysis Request

BTEX + ~~MTBE + TMB's~~ (8021B)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / ~~MRO~~)	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water - 300.1)		3 pt. composite sample	4 pt. composite sample	Air Bubbles (Y or N)
		✓												✓	
		✓													✓

Date:	Time:	Relinquished by:	Received by:	Date	Time
10/2/14	1531		Christy Walker	10/2/14	1531
10/2/14	1801	Christy Walker		10/13/14	0740

Remarks:
BILL DIRECTLY TO BP:
Jeff Peace, 200 Energy Court, Farmington, NM 87401

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.