OIL CONS. DIV DIST. 3

NOV 23 2015

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-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: Steve Moskal
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497
Facility Name: GCU #320	Facility Type: Natural gas well

Surface Owner: Federal	Mineral Owner: Federal	API No. 3004524732

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County: San Juan
I	30	28N	12W	1,850	South	820	East	

Latitude 36.63112 **Longitude** -108.14691

NATURE OF RELEASE

Type of Release: none	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: below grade tank – 95 bbl	Date and Hour of Occurrence:	Date and Hour of Discovery:
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.* Sampling of the soil beneath the BGT was done during removal to ensure no soil impacts from the BGT. Soil analysis resulted in BTEX and chloride below the BGT closure. TPH analysis via Method 418.1 exceeded the BGT closure standards; however analysis for TPH via 8015 determined no remedial action is necessary following the spill and release guidelines. 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: Steve Moskal	Approved by Environmental Specialist:
Title: Field Environmental Coordinator	Approval Date: 11/25/2015 Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval: Attached ☐
Date: November 18, 2015 Phone: 505-326-9497	

* Attach Additional Sheets If Necessary

nJK1530348253

10

CLIENT: BP

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

API #: 3004524732

FIELD REPORT:

BGT CONFIRMATION / TEMP. PIT CLOSURE / RELEASE INVESTIGATION
(other)

PAGE No: 1 of 1

SITE INFORMATION:

SITE NAME: GCU # 320

QUAD/UNIT: I SEC: 30 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM

QTR-QTR/FOOTAGE: 1,850'S / 820'E NE/SE LEASE TYPE: FEDERAL / STATE / FEE / INDIAN

LEASE #: SF078904A PROD. FORMATION: PC CONTRACTOR: ELKHORN

DATE STARTED: 03/20/09

DATE FINISHED:

ENVIRONMENTAL SPECIALIST: JCB

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.63107 X 108.14691 GL ELEV.: 5,727'

		GPS COORD.	DISTANCE/BEARING FROM W.H.
1)	95 BGT (SW/DB)	36.63112 X 108.14669	66', N79E
2)			
3)			
4)			
5)			

LAB INFORMATION:

CHAIN OF CUSTODY RECORD(S): ENVIROTECH

	SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:
1)	95 BGT 5 pt. @ 6'	03/20/09	1620	418.1/8015B/8021B/300.0 (Cl)
2)				
3)				
4)				
5)				

SOIL DESCRIPTION:

SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER

SOIL COLOR: DARK YELLOWISH ORANGE

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

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

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

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

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

DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION -

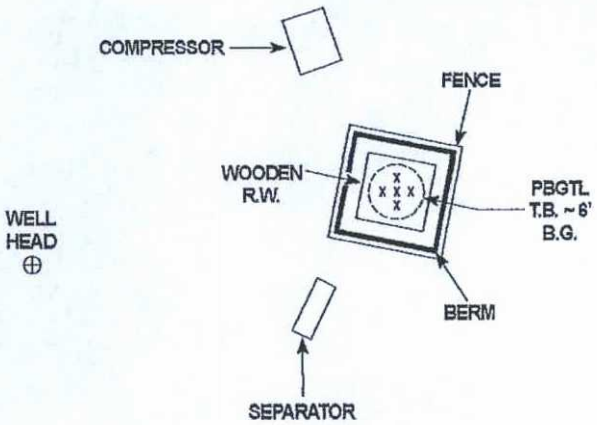
HC ODOR DETECTED: YES / NO EXPLANATION -

SAMPLE TYPE: GRAB / COMPOSITE - # OF PTS. 5

ADDITIONAL COMMENTS: GAS WELL TO BE PLUGGED & ABANDONED. NO APPARENT EVIDENCE OF A RELEASE OBSERVED FROM BGT.

EXCAVATION DIMENSIONS (if applicable): NA ft. X NA ft. X NA ft. cubic yards excavated (if applicable): NA

SITE SKETCH



PLOT PLAN
circle: Attached

MISCELL. NOTES

SW - SINGLE WALLED
DB - DOUBLE BOTTOM

SIDEWALLS VISIBLE

MAGNETIC DECLINATION @ 13.5°E

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW, T.H. = TEST HOLE; ~ = APPROX.; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL

TRAVEL NOTES: CALLOUT: ONSITE: 03/20/09

revised: 11/21/08

BEI1005E.SKF

envirotech
Analytical Laboratory

EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS

Client:	Blagg /BP	Project #:	94034-0010
Sample ID:	95 BGT 5-Pt @ 6'	Date Reported:	03-26-09
Laboratory Number:	49435	Date Sampled:	03-20-09
Chain of Custody No:	5971	Date Received:	03-23-09
Sample Matrix:	Soil	Date Extracted:	03-25-09
Preservative:	Cool	Date Analyzed:	03-25-09
Condition:	Intact	Analysis Needed:	TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	750	9.6

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: GCU 320.

Analyst

Review

5796 US Highway 64, Farmington, NM 87401 | Ph (505) 632-0615 Fr (800) 362-1879 Fx (505) 632-1865 lab@envirotech-inc.com envirotech-inc.com

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Analytical Laboratory

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ 6'	Date Reported:	03-26-09
Laboratory Number:	49435	Date Sampled:	03-20-09
Chain of Custody No:	5971	Date Received:	03-23-09
Sample Matrix:	Soil	Date Extracted:	03-24-09
Preservative:	Cool	Date Analyzed:	03-25-09
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU 320.

Analyst

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EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ 6'	Date Reported:	03-26-09
Laboratory Number:	49435	Date Sampled:	03-20-09
Chain of Custody:	5971	Date Received:	03-23-09
Sample Matrix:	Soil	Date Analyzed:	03-25-09
Preservative:	Cool	Date Extracted:	03-24-09
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	ND	1.0
Ethylbenzene	ND	1.0
p,m-Xylene	ND	1.2
o-Xylene	ND	0.9
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	98.0 %
	1,4-difluorobenzene	98.0 %
	Bromochlorobenzene	98.0 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU 320

Analyst

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Chloride

Client:	Blagg/BP	Project #:	94034-0010
Sample ID:	95 BGT 5-pt @ 6'	Date Reported:	03-26-09
Lab ID#:	49435	Date Sampled:	03-20-09
Sample Matrix:	Soil	Date Received:	03-23-09
Preservative:	Cool	Date Analyzed:	03-25-09
Condition:	Intact	Chain of Custody:	5971

Parameter	Concentration (mg/Kg)
Total Chloride	100

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: GCU 320.

Analyst

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5971

CHAIN OF CUSTODY RECORD

Client: Blagg/BP	Project Name / Location: GCU 320	ANALYSIS / PARAMETERS
Client Address:	Sampler Name: J. Blagg	
Client Phone No.:	Client No.: 94034-010	

Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative HgCl	Preservative HCl		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
BJ 5pt, S-pit @ [illegible]	3/20/09	1620	49435	(Soil) Sludge Solid Aqueous	1 - 4oz				X	X							X	X					
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
J. Blagg (signature)	3/21/09	0815	(signature)	3/21/09	0815
(signature)	3/23/09	1601	(signature)	3/23/09	1601

ENVIROTECH INC.

5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505-632-0615

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Analytical Laboratory

EPA METHOD 418.1
TOTAL PETROLEUM HYROCARBONS
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	03-26-09
Laboratory Number:	03-25-TPH.QA/QC 49396	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	03-25-09
Preservative:	N/A	Date Extracted:	03-25-09
Condition:	N/A	Analysis Needed:	TPH

Calibration	I-Cal Date	C-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
	03-23-09	03-25-09	1,340	1,430	6.7%	+/- 10%

Blank Conc. (mg/Kg)	Concentration	Detection Limit
TPH	ND	9.6

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
TPH	21.4	18.2	15.0%	+/- 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
TPH	21.4	2,000	1,660	82.1%	80 - 120%

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **QA/QC for Samples 49395 - 49402, 49435 and 49437.**

Analyst

Review

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Analytical Laboratory

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	03-25-09 QA/QC	Date Reported:	03-26-09
Laboratory Number:	49435	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-25-09
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
Gasoline Range C5 - C10	05-07-07	1.0163E+003	1.0167E+003	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	1.0009E+003	1.0013E+003	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	ND	250	248	99.2%	75 - 125%
Diesel Range C10 - C28	ND	250	256	102%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for Samples 49435 - 49436.

Analyst

Review

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EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	03-25-BT QA/QC	Date Reported:	03-26-09
Laboratory Number:	49380	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	03-25-09
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff. Accept. Range 0 - 15%	Blank Conc	Detect. Limit
Benzene	2.7216E+007	2.7270E+007	0.2%	ND	0.1
Toluene	1.8925E+007	1.8963E+007	0.2%	ND	0.1
Ethylbenzene	1.4330E+007	1.4369E+007	0.2%	ND	0.1
p,m-Xylene	3.4675E+007	3.4745E+007	0.2%	ND	0.1
o-Xylene	1.4468E+007	1.4497E+007	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	2.2	2.3	4.5%	0 - 30%	0.9
Toluene	16.3	15.9	2.5%	0 - 30%	1.0
Ethylbenzene	2.6	2.5	3.8%	0 - 30%	1.0
p,m-Xylene	26.2	24.8	5.3%	0 - 30%	1.2
o-Xylene	10.5	10.2	2.9%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	2.2	50.0	51.7	99.0%	39 - 150
Toluene	16.3	50.0	62.3	94.0%	46 - 148
Ethylbenzene	2.6	50.0	50.6	96.2%	32 - 160
p,m-Xylene	26.2	100	124	98.3%	46 - 148
o-Xylene	10.5	50.0	56.5	93.4%	46 - 148

ND - Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 49380 - 49387 and 49435.

Analyst

Review

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