

State of New Mexico  
Energy Minerals and Natural Resources

DEC 21 2015

Form C-141  
Revised August 8, 2011

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

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

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: Hughes 003E	Facility Type: Natural gas well
Surface Owner: Federal	Mineral Owner: Federal
API No. 3004524999	

**LOCATION OF RELEASE**

Unit Letter A	Section 20	Township 29N	Range 8W	Feet from the 985	North/South Line North	Feet from the 1,000	East/West Line East	County: San Juan
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Latitude 36.71529° Longitude -107.69321°

**NATURE OF RELEASE**

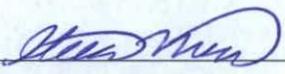
Type of Release: Historic Production Pit	Volume of Release: unknown	Volume Recovered: none
Source of Release: Discovery of historic production pit during BGT replacement.	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: October 28, 2015, 12:20PM
Was Immediate Notice Given? <input type="checkbox"/> 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.\* During removal of BGT for upgrade, construction crew reported evidence of impacted soils below the BGT. The BGT and associated piping appeared to be in good, working condition. Further assessment found impacts of TPH above BGT closure standards at 6.0' below ground surface. Sandstone was encountered at 6 feet below ground surface.

Describe Area Affected and Cleanup Action Taken.\* BP has excavated the impacted soils following the NMOCD soil remediation guidelines based on a site ranking of 10 points requiring a TPH closure standard of 1,000 ppm. Final excavation dimensions measured 18'x18'x7.5' deep. The BLM and NMOCD were notified of the closure sampling event, however neither party was able to attend (as documented in the attached email). Laboratory results for the closure samples were below laboratory detection limits for TPH and BTEX and below 60 ppm for chloride. Attached is the final laboratory report and photos documenting the sample locations. The excavation has been backfilled and the BGT will be upgraded as previously planned.

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: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: <u>12/29/2015</u>	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: December 21, 2015	Phone: 505-326-9497	

\* Attach Additional Sheets If Necessary

NVF1535747613

# BP America: Hughes 3E

(A) Sec 20 – T29N – R8W

API: 30-045-24999

San Juan County, New Mexico

## Summary Record of Impact Remediation

October 28, 2015 Soils impacted with hydrocarbons encountered during modification upgrade of 95 bbl BGT from single wall/single bottom to double wall/double bottom BGT. Impacts found immediately below BGT, but there was no evidence of an integrity issue with the BGT or piping. Suspected source from an historical overflow event.

Site Closure Standard Determined at 1,000 ppm TPH based on information from site BGT upgrade permit signed by NMOCD on Nov 20, 2015:

Horizontal Distance to Closest USGS Blue Line > 200 feet (10 points)

Nearest Water Well > 1,000 feet (0 points)

Depth to Groundwater >100 feet (0 points)

December 10, 2015 Initiate and complete remediation of site by excavation of impacts with trackhoe. Final excavation size 18' x 18' x 7.5' deep. Collect 3-point composite samples of NW, NW, SW and SE sidewalls and 5-point composite sample of base. Entire excavation in soft, purple colored shalestone.

December 11, 2015 Receive rush laboratory lab reports. All samples test TPH (US EPA Method 8015) at non-detect, BTEX at non-detect and chlorides at < 60 mg/Kg. Excavation crew completes backfilling with clean soils. Impacted soils transported to JFJ Landfarm in San Juan County, New Mexico. Final C-138 soil volume = 60 cubic yards.

BP America  
Hughes 3E  
(A) Sec 20 - T29N - R8W  
API: 30-045-24999

NW Wall  
NE Wall  
SW Wall  
SE Wall

95 BGT Excavation on December 10, 2015  
18' x 18' x 7.5' Deep

Field Samples Collected 12/10/2015 for Lab Testing (TPH, BTEX & Cl-)

<u>Sample ID</u>	<u>Time</u>	<u>Field OVM</u>	<u>Lab TPH (8015)</u>
NE Wall 3-point 2'-7' Depth	1118	20.0 ppm	ND
NW Wall 3-point 2'-7' Depth	1121	8.1 ppm	ND
SW Wall 3-point 2'-7' Depth	1125	3.5 ppm	ND
SE Wall 3-point 2'-7' Depth	1131	102 ppm	ND
Base 5-point @ 7.5' Depth	1128	3.0 ppm	ND



SW Wall  
Composite Sample Points

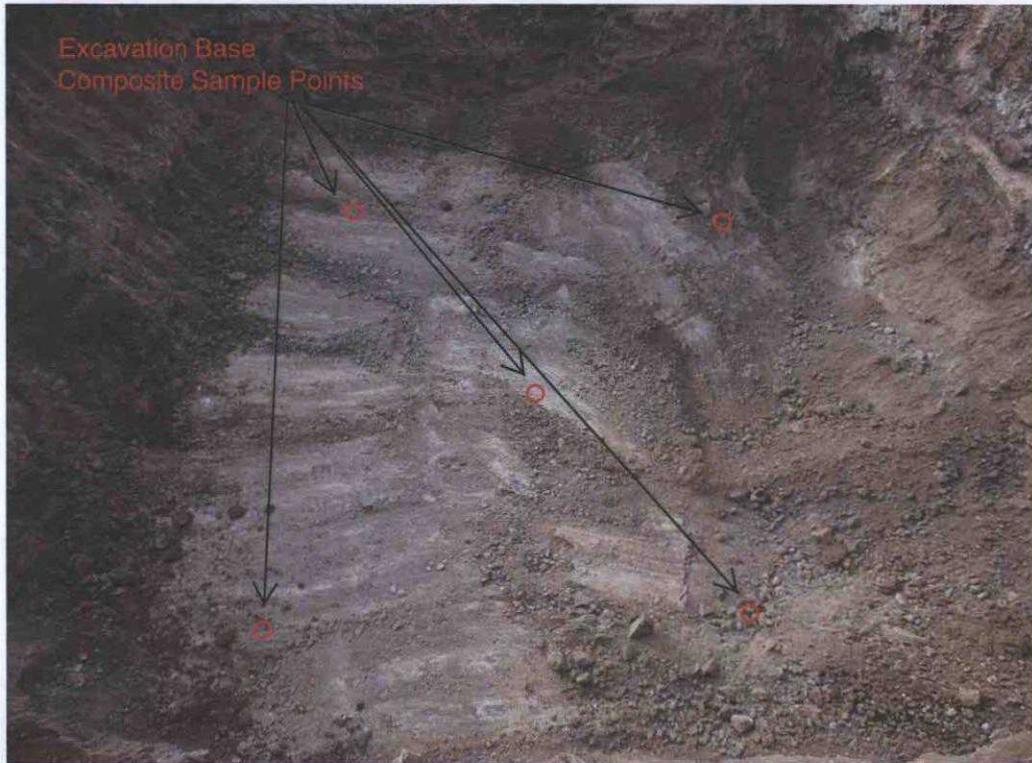




NE Wall  
Composite Sample Points



NW Wall  
Composite Sample Points





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

December 15, 2015

Jeff Blagg  
Blagg Engineering  
P. O. Box 87  
Bloomfield, NM 87413  
TEL: (505) 320-1183  
FAX

RE: Hughes 3E

OrderNo.: 1512552

Dear Jeff Blagg:

Hall Environmental Analysis Laboratory received 5 sample(s) on 12/11/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a horizontal line.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

Analytical Report

Lab Order 1512552

Date Reported: 12/15/2015

**Hall Environmental Analysis Laboratory, Inc.**

CLIENT: Blagg Engineering

Client Sample ID: NW Wall 3-pt 2'-7'

Project: Hughes 3E

Collection Date: 12/10/2015 11:21:00 AM

Lab ID: 1512552-001

Matrix: MEOH (SOIL)

Received Date: 12/11/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	31	30		mg/Kg	20	12/11/2015 11:12:39 AM	22775
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.8		mg/Kg	1	12/11/2015 10:35:01 AM	22740
Surr: DNOP	92.8	70-130		%REC	1	12/11/2015 10:35:01 AM	22740
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	12/11/2015 9:46:50 AM	A30785
Surr: BFB	90.7	66.2-112		%REC	1	12/11/2015 9:46:50 AM	A30785
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.047		mg/Kg	1	12/11/2015 9:46:50 AM	C30785
Toluene	ND	0.047		mg/Kg	1	12/11/2015 9:46:50 AM	C30785
Ethylbenzene	ND	0.047		mg/Kg	1	12/11/2015 9:46:50 AM	C30785
Xylenes, Total	ND	0.094		mg/Kg	1	12/11/2015 9:46:50 AM	C30785
Surr: 4-Bromofluorobenzene	116	80-120		%REC	1	12/11/2015 9:46:50 AM	C30785

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	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	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	

Analytical Report

Lab Order 1512552

Date Reported: 12/15/2015

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

**Client Sample ID:** NE Wall 3-pt 2'-7'

**Project:** Hughes 3E

**Collection Date:** 12/10/2015 11:18:00 AM

**Lab ID:** 1512552-002

**Matrix:** MEOH (SOIL)

**Received Date:** 12/11/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	38	30		mg/Kg	20	12/11/2015 11:25:04 AM	22775
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	12/11/2015 10:56:21 AM	22740
Surr: DNOP	92.2	70-130		%REC	1	12/11/2015 10:56:21 AM	22740
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	3.7		mg/Kg	1	12/11/2015 10:11:29 AM	A30785
Surr: BFB	95.7	66.2-112		%REC	1	12/11/2015 10:11:29 AM	A30785
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.037		mg/Kg	1	12/11/2015 10:11:29 AM	C30785
Toluene	ND	0.037		mg/Kg	1	12/11/2015 10:11:29 AM	C30785
Ethylbenzene	ND	0.037		mg/Kg	1	12/11/2015 10:11:29 AM	C30785
Xylenes, Total	ND	0.074		mg/Kg	1	12/11/2015 10:11:29 AM	C30785
Surr: 4-Bromofluorobenzene	124	80-120	S	%REC	1	12/11/2015 10:11:29 AM	C30785

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	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	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	

**Analytical Report**

Lab Order 1512552

Date Reported: 12/15/2015

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

**Client Sample ID:** SW Wall 3-pt 2'-7'

**Project:** Hughes 3E

**Collection Date:** 12/10/2015 11:25:00 AM

**Lab ID:** 1512552-003

**Matrix:** MEOH (SOIL)

**Received Date:** 12/11/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	32	30		mg/Kg	20	12/11/2015 11:37:28 AM	22775
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.3		mg/Kg	1	12/11/2015 11:17:58 AM	22740
Surr: DNOP	94.7	70-130		%REC	1	12/11/2015 11:17:58 AM	22740
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.5		mg/Kg	1	12/11/2015 10:36:06 AM	A30785
Surr: BFB	97.1	66.2-112		%REC	1	12/11/2015 10:36:06 AM	A30785
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.045		mg/Kg	1	12/11/2015 10:36:06 AM	C30785
Toluene	ND	0.045		mg/Kg	1	12/11/2015 10:36:06 AM	C30785
Ethylbenzene	ND	0.045		mg/Kg	1	12/11/2015 10:36:06 AM	C30785
Xylenes, Total	ND	0.090		mg/Kg	1	12/11/2015 10:36:06 AM	C30785
Surr: 4-Bromofluorobenzene	123	80-120	S	%REC	1	12/11/2015 10:36:06 AM	C30785

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	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	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	

Analytical Report

Lab Order 1512552

Date Reported: 12/15/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: SE Wall 3-pt 2'-7'

Project: Hughes 3E

Collection Date: 12/10/2015 11:31:00 AM

Lab ID: 1512552-004

Matrix: MEOH (SOIL)

Received Date: 12/11/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	56	30		mg/Kg	20	12/11/2015 11:49:52 AM	22775
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.3		mg/Kg	1	12/11/2015 11:39:23 AM	22740
Surr: DNOP	94.9	70-130		%REC	1	12/11/2015 11:39:23 AM	22740
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.1		mg/Kg	1	12/11/2015 11:00:52 AM	A30785
Surr: BFB	113	66.2-112	S	%REC	1	12/11/2015 11:00:52 AM	A30785
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.041		mg/Kg	1	12/11/2015 11:00:52 AM	C30785
Toluene	ND	0.041		mg/Kg	1	12/11/2015 11:00:52 AM	C30785
Ethylbenzene	ND	0.041		mg/Kg	1	12/11/2015 11:00:52 AM	C30785
Xylenes, Total	ND	0.082		mg/Kg	1	12/11/2015 11:00:52 AM	C30785
Surr: 4-Bromofluorobenzene	127	80-120	S	%REC	1	12/11/2015 11:00:52 AM	C30785

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

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	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	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix		

Analytical Report

Lab Order 1512552

Date Reported: 12/15/2015

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

**Client Sample ID:** Base 5-pt 7.5'

**Project:** Hughes 3E

**Collection Date:** 12/10/2015 11:28:00 AM

**Lab ID:** 1512552-005

**Matrix:** MEOH (SOIL)

**Received Date:** 12/11/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	ND	30		mg/Kg	20	12/11/2015 12:02:17 PM	22775
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	12/11/2015 12:00:52 PM	22740
Surr: DNOP	92.3	70-130		%REC	1	12/11/2015 12:00:52 PM	22740
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	3.8		mg/Kg	1	12/11/2015 11:25:35 AM	A30785
Surr: BFB	98.6	66.2-112		%REC	1	12/11/2015 11:25:35 AM	A30785
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.038		mg/Kg	1	12/11/2015 11:25:35 AM	C30785
Toluene	ND	0.038		mg/Kg	1	12/11/2015 11:25:35 AM	C30785
Ethylbenzene	ND	0.038		mg/Kg	1	12/11/2015 11:25:35 AM	C30785
Xylenes, Total	ND	0.077		mg/Kg	1	12/11/2015 11:25:35 AM	C30785
Surr: 4-Bromofluorobenzene	126	80-120	S	%REC	1	12/11/2015 11:25:35 AM	C30785

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

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	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	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1512552

15-Dec-15

Client: Blagg Engineering

Project: Hughes 3E

Sample ID	MB-22775	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	22775	RunNo:	30809					
Prep Date:	12/14/2015	Analysis Date:	12/11/2015	SeqNo:	941358	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-22775	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	22775	RunNo:	30809					
Prep Date:	12/14/2015	Analysis Date:	12/11/2015	SeqNo:	941359	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.8	90	110			

## Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1512552

15-Dec-15

Client: Blagg Engineering

Project: Hughes 3E

Sample ID	MB-22740	SampType	MBLK	TestCode	EPA Method 8015M/D: Diesel Range Organics					
Client ID	PBS	Batch ID	22740	RunNo	30776					
Prep Date	12/11/2015	Analysis Date	12/11/2015	SeqNo	940038	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	9.1		10.00		91.1	70	130			

Sample ID	LCS-22740	SampType	LCS	TestCode	EPA Method 8015M/D: Diesel Range Organics					
Client ID	LCSS	Batch ID	22740	RunNo	30776					
Prep Date	12/11/2015	Analysis Date	12/11/2015	SeqNo	940272	Units	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	44	10	50.00	0	87.6	57.4	139			
Surr: DNOP	4.2		5.000		85.0	70	130			

Sample ID	1512552-001AMS	SampType	MS	TestCode	EPA Method 8015M/D: Diesel Range Organics					
Client ID	NW Wall 3-pt 2'-7'	Batch ID	22740	RunNo	30776					
Prep Date	12/11/2015	Analysis Date	12/11/2015	SeqNo	940538	Units	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	9.5	47.57	3.829	86.1	31.2	162			
Surr: DNOP	4.2		4.757		87.9	70	130			

Sample ID	1512552-001AMSD	SampType	MSD	TestCode	EPA Method 8015M/D: Diesel Range Organics					
Client ID	NW Wall 3-pt 2'-7'	Batch ID	22740	RunNo	30776					
Prep Date	12/11/2015	Analysis Date	12/11/2015	SeqNo	940539	Units	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	50	10	50.51	3.829	92.0	31.2	162	11.6	31.7	
Surr: DNOP	4.5		5.051		88.8	70	130	0	0	

## Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1512552  
15-Dec-15

Client: Blagg Engineering  
Project: Hughes 3E

Sample ID	<b>5ML RB</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8015D: Gasoline Range</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>A30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940837</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	920		1000		91.5	66.2	112			

Sample ID	<b>2.5UG GRO LCS</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8015D: Gasoline Range</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>A30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940838</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	91.0	79.6	122			
Surr: BFB	1100		1000		106	66.2	112			

Sample ID	<b>1512552-001AMS</b>	SampType:	<b>MS</b>	TestCode:	<b>EPA Method 8015D: Gasoline Range</b>					
Client ID:	<b>NW Wall 3-pt 2'-7'</b>	Batch ID:	<b>A30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940839</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	21	4.7	23.58	0	90.8	62.5	151			
Surr: BFB	1100		943.4		112	66.2	112			S

Sample ID	<b>1512552-001AMSD</b>	SampType:	<b>MSD</b>	TestCode:	<b>EPA Method 8015D: Gasoline Range</b>					
Client ID:	<b>NW Wall 3-pt 2'-7'</b>	Batch ID:	<b>A30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940840</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	21	4.7	23.59	0	88.5	62.5	151	2.50	22.1	
Surr: BFB	1100		943.5		113	66.2	112	0	0	S

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1512552

15-Dec-15

**Client:** Blagg Engineering

**Project:** Hughes 3E

Sample ID	<b>5ML RB</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>C30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940861</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.2		1.000		116	80	120			

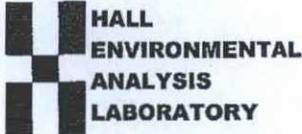
Sample ID	<b>100NG BTEX LCS</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>C30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940862</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.050	1.000	0	95.8	80	120			
Toluene	0.91	0.050	1.000	0	91.3	80	120			
Ethylbenzene	0.94	0.050	1.000	0	94.3	80	120			
Xylenes, Total	2.7	0.10	3.000	0	91.4	80	120			
Surr: 4-Bromofluorobenzene	1.3		1.000		134	80	120			S

Sample ID	<b>1512552-002AMS</b>	SampType:	<b>MS</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>NE Wall 3-pt 2'-7'</b>	Batch ID:	<b>C30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940863</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.65	0.037	0.7429	0	87.3	69.6	136			
Toluene	0.66	0.037	0.7429	0	89.4	76.2	134			
Ethylbenzene	0.71	0.037	0.7429	0	95.8	75.8	137			
Xylenes, Total	2.0	0.074	2.229	0	90.9	78.9	133			
Surr: 4-Bromofluorobenzene	1.0		0.7429		135	80	120			S

Sample ID	<b>1512552-002AMSD</b>	SampType:	<b>MSD</b>	TestCode:	<b>EPA Method 8021B: Volatiles</b>					
Client ID:	<b>NE Wall 3-pt 2'-7'</b>	Batch ID:	<b>C30785</b>	RunNo:	<b>30785</b>					
Prep Date:		Analysis Date:	<b>12/11/2015</b>	SeqNo:	<b>940864</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.64	0.037	0.7429	0	86.5	69.6	136	0.909	20	
Toluene	0.65	0.037	0.7429	0	87.2	76.2	134	2.51	20	
Ethylbenzene	0.69	0.037	0.7429	0	92.6	75.8	137	3.40	20	
Xylenes, Total	2.0	0.074	2.229	0	88.7	78.9	133	2.51	20	
Surr: 4-Bromofluorobenzene	1.0		0.7429		139	80	120	0	0	S

**Qualifiers:**

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- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit



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: **1512552**

RcptNo: **1**

Received by/date: *Ja* **12/11/15**  
 Logged By: **Joe Archuleta** **12/11/2015 7:00:00 AM** *JA*  
 Completed By: **Joe Archuleta** **12/11/2015 7:28:47 AM** *JA*  
 Reviewed By: *Ja/AS* **12/11/15**

**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	1.5	Good	Yes			

# Chain-of-Custody Record

Client: BP America

Mailing Address: BLAGG Engineering

Phone #: 505-320-1183

Email or Fax#:

QA/QC Package:

Standard  Level 4 (Full Validation)

Accreditation:

NELAP  Other \_\_\_\_\_

EDD (Type) \_\_\_\_\_

Turn-Around Time:

Standard  Rush ASAP SAME DAY

Project Name:

HUGHES 3E

Project #:

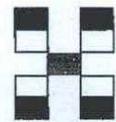
Project Manager:

J. Blagg

Sampler: J. Blagg

On Ice:  Yes  No

Sample Temperature: 1.5



## HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

### Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX + MTBE + PMP's (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F, Cl, NO <sub>3</sub> , NO <sub>2</sub> , PO <sub>4</sub> , SO <sub>4</sub> )	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	CHLORINE	Air Bubbles (Y or N)
<u>10/15/15</u>	<u>1121</u>	<u>SOIL</u>	<u>NW WALL 3-PC 2'-7'</u>	<u>4oz x 1</u>	<u>COOL</u>	<u>-001</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	
<u>"</u>	<u>1118</u>	<u>"</u>	<u>NE WALL 3-PC 2'-7'</u>	<u>"</u>	<u>"</u>	<u>-002</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	
<u>"</u>	<u>1125</u>	<u>"</u>	<u>SW WALL 3-PC 2'-7'</u>	<u>"</u>	<u>"</u>	<u>-003</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	
<u>"</u>	<u>1131</u>	<u>"</u>	<u>SE WALL 3-PC 2'-7'</u>	<u>"</u>	<u>"</u>	<u>-004</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	
<u>"</u>	<u>1128</u>	<u>"</u>	<u>BASE 5-PC @ 7 1/2'</u>	<u>"</u>	<u>"</u>	<u>-005</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>									<input checked="" type="checkbox"/>	

Date: 10/15 Time: 1259 Relinquished by: J. Blagg

Date: 10/15 Time: 1840 Relinquished by: M. Waller

Received by: Christ Wheeler Date: 12/10/15 Time: 1259

Received by: Bob. Cant Date: 12/11/15 Time: 0700

Remarks: Bill BP  
VID: VHIXONEVRM  
REF: P-451  
CONTACT: Steve MOSKAL

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.

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  
220 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

<b>1. Generator Name and Address:</b> BP America Production Co. 200 Energy Ct. Farmington, NM 87401
<b>2. Originating Site:</b> Hughes 003E Paykey: <u>VHIXONEV-ERM</u>
<b>3. Location of Material (Street Address, City, State or ULSTR):</b> QRT/QRT: NE/NE Unit: A Section: 20 T29N R08W
<b>4. Source and Description of Waste: Hydrocarbon impacted soils</b> Estimated Volume <u>200</u> yd <sup>3</sup> / bbls Known Volume (to be entered by the operator at the end of the haul) <u>40</u> yd <sup>3</sup> / bbls
<b>5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS</b> I, <u>Steve Moskal</u> , representative or authorized agent for <u>BP America Production Company</u> 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) <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Weekly <input type="checkbox"/> Per Load <input type="checkbox"/> RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR 261.11, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items) <input type="checkbox"/> MSDS Information <input type="checkbox"/> RCRA Hazardous Waste Analysis <input checked="" type="checkbox"/> Process Knowledge <input type="checkbox"/> Other (Provide description)
<b>GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS</b> <u>Steve Moskal</u> , representative for <u>BP America Production Company</u> authorize IEL to complete and sign the Generator Waste Testing Certification. I, <u>h. Selph</u> , representative for <u>IEL</u> 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 results have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The following documentation of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 19.15.36 NMAC.
<b>5. Transporter:</b> Crossfire

#### OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: Industrial Ecosystems Inc., JFJ Waste Management Facility (JFJ), Permit NM-01-0010B

Address of Facility: #49 CR 3150 Aztec, NM

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: h. Selph

TITLE: clerk DATE: 12/11/10

SIGNATURE: h. Selph

TELEPHONE NO.: 6032-1782

Surface Waste Management Facility Authorized Agent

PH-8  
CL-2132

12/2