

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

15864

Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Modification to an existing permit  
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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 133E  
API Number: 3004525234 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr C Section 17.0 Township 29.0N Range 12W County: San Juan County  
Center of Proposed Design: Latitude 36.73200 Longitude -108.12550 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 Pit: Subsection F or G of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 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 \_\_\_\_\_

OIL CONS. DIV DIST. 3  
FEB 16 2017

3.  
 Closed-loop System: Subsection H of 19.15.17.11 NMAC  
Type of Operation:  P&A  Drilling a new well  Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
 Drying Pad  Above Ground Steel Tanks  Haul-off Bins  Other \_\_\_\_\_  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_

4.  
 Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank ID: B  
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 SIDEWALLS NOT VISIBLE  
Liner type: Thickness \_\_\_\_\_ mil  HDPE  PVC  Other \_\_\_\_\_

5.  
 Alternative Method:  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.  
**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 \_\_\_\_\_

7.  
**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)

8.  
**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

9.  
**Administrative Approvals 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:**  
 Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.  
**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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
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). - 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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; 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 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 500 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 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

11. **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: \_\_\_\_\_

12. **Closed-loop Systems 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.

Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9  
 Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: \_\_\_\_\_  
 Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13. **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 H<sub>2</sub>S, 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

14. **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  Closed-loop System  
 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15. **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 F 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 I of 19.15.17.13 NMAC  
 Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)

*Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

Yes (If yes, please provide the information below)  No

*Required for impacted areas which will not be used for future service and operations:*

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 I of 19.15.17.13 NMAC

Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.*

Ground water is less than 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 between 50 and 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
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 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). - 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 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, 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
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. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 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 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

18.

**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 F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19. **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: \_\_\_\_\_

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

OCD Representative Signature: Jan [Signature] Approval Date: 2/23/2017  
Title: Environmental Specialist OCD Permit Number: \_\_\_\_\_

21. **Closure Report (required within 60 days of closure completion):** Subsection K of 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: 12\15\2016

22. **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.

23. **Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_  
Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

Yes (If yes, please demonstrate compliance to the items below)  No

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24. **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)
- 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 36.73200 Longitude -108.12550 NAD:  1927  1983

25. **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): Steve Moskal Title: Field Environmental Coordinator  
Signature: [Signature] Date: 02\15\2017  
e-mail address: steven.moskal@bp.com Telephone: 505-326-9497

BP AMERICA PRODUCTION COMPANY  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

**Gallegos Canyon Unit # 133E – Tank ID: B**  
**API #: 3004525234**  
**Unit Letter C, Section 17, T29N, 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 was provided and documented in the attached email.**

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/or sludge within 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 for recycling.**

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	Release Verification (mg/Kg)	Sample Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.018
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.073
TPH	US EPA Method SW-846 418.1	100	<48
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<30

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 beneath the BGT was sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are 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 reveal no evidence of a release has 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.

**Sampling results reveal no evidence of a release has occurred. Area was backfilled with clean, earthen material and is within the active well pad.**

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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.**

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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.**
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 BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.**
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.  
**The BGT area has been backfilled and will be reclaimed once the well has been plugged & abandoned.**
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 successfully completed.**
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 & contains a photo of the reclamation completion.**
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  
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 <b>BP America Production Company</b>	Contact <b>Steve Moskal</b>
Address <b>200 Energy Court, Farmington, NM 87401</b>	Telephone No. <b>(505) 326-9497</b>
Facility Name <b>GALLEGOS CANYON UNIT 133E</b>	Facility Type <b>Natural Gas Well</b>

Surface Owner <b>Federal</b>	Mineral Owner <b>Federal</b>	API No. <del>3004507766</del>
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**LOCATION OF RELEASE**

30-045-25234

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	17	29N	12W	850	NORTH	1,550	WEST	SAN JUAN

Latitude 36.73200 Longitude -108.12550

**NATURE OF RELEASE**

Type of Release <b>NONE – BGT CONFIRMATION SAMPLING</b>	Volume of Release <b>N/A</b>	Volume Recovered <b>N/A</b>
Source of Release <b>NOT APPLICABLE (N/A)</b>	Date and Hour of Occurrence <b>N/A</b>	Date and Hour of Discovery <b>N/A</b>
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.\* **NO INDICATION OF ANY INTEGRITY &/OR MAINTENANCE PROBLEMS WITH THE BGT, THEREFORE NO REMEDIAL ACTION NECESSARY. SAMPLING BENEATH BGT WAS CONDUCTED IMMEDIATELY AFTER REMOVAL. FIELD & LABORATORY ANALYTICAL REPORTS ARE ATTACHED.**

Describe Area Affected and Cleanup Action Taken.\* **NO CLEANUP ACTION NECESSARY. FINAL LABORATORY RESULTS SUPPORT CLOSURE OF THE BGT LOCATION.**

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: 	<b><u>OIL CONSERVATION DIVISION</u></b>		
Printed Name: <b>Steve Moskal</b>	Approved by Environmental Specialist:		
Title: <b>Environmental Field Coordinator</b>	Approval Date:	Expiration Date:	
E-mail Address: <b>steven.moskal@bp.com</b>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <b>December 15, 2016</b>	Phone: <b>(505) 326-9497</b>		

\* Attach Additional Sheets If Necessary

**BP Pit Close Notification - GALLEGOS CANYON UNIT 133E**

12/05/16 at 3:36 PM

From: Railsback, Farrah (CH2M HILL) <Farrah.Railsback@bp.com>

To: Smith, Cory, EMNRD, Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us)

CC: jeffcblagg@aol.com, blagg\_njv@yahoo.com, Moskal, Steven

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

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

December 5, 2016

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 133E  
API 30-045-25234  
(C) Section 17 – T29N – R12W  
San Juan County, New Mexico

Dear Mr. Cory Smith and Mrs. Vanessa Fields,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a BGT that will no longer be operational at this well site. We anticipate this work to start on or around December 9, 2016.

21661  
SM

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

Sincerely,

Steven Moskal  
BP Field Environmental Coordinator

(505) 326-9497

**Farrah Railsback**

BGT Project Support  
970-946-9199 -cell

*This email and any attachments are intended only for the addressee(s) listed above and may contain confidential, proprietary, and/or privileged information. If you are not an intended recipient, please immediately advise the sender by return email, delete this email and any attachments, and destroy any copies of same. Any unauthorized review, use, copying disclosure or distribution of this email and any attachments is prohibited.*



BP America Production Company  
200 Energy Court  
Farmington, NM 87401

December 5, 2016

Bureau of Land Management  
Whitney Thomas  
6251 College Suite A  
Farmington, NM 87402

**VIA EMAIL**

Re: Notification of plans to close/remove a below grade tank  
Well Name: GALLEGOS CANYON UNIT 133E  
API #: 3004525234

Dear Mrs. Thomas,

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 December 9, 2016. 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.

If witnessing of the tank removal is required please contact me for a specific time (505)-326-9497.

Sincerely,

Steven Moskal

BP America Production Company

CLIENT: <b>BP</b>	<b>BLAGG ENGINEERING, INC.</b> P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	API #: <b>3004525234</b> TANK ID (if applicable): <b>B</b>
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**FIELD REPORT:** (circle one):  BGT CONFIRMATION /  RELEASE INVESTIGATION /  OTHER: \_\_\_\_\_

SITE INFORMATION: SITE NAME: <b>GCU # 133E</b>	PAGE #: <b>1</b> of <b>1</b>
QUAD/UNIT: <b>C</b> SEC: <b>17</b> TWP: <b>29N</b> RNG: <b>12W</b> PM: <b>NM</b> CNTY: <b>SJ</b> ST: <b>NM</b>	DATE STARTED: <b>12/09/16</b>
1/4 -1/4/FOOTAGE: <b>850'N / 1,550'W</b> <b>NE/NW</b> LEASE TYPE: <input checked="" type="checkbox"/> FEDERAL / STATE / FEE / INDIAN	DATE FINISHED: _____
LEASE #: <b>SF078370</b> PROD. FORMATION: <b>DK</b> CONTRACTOR: <b>BP - A. SALAZAR</b>	ENVIRONMENTAL SPECIALIST(S): <b>NJV</b>

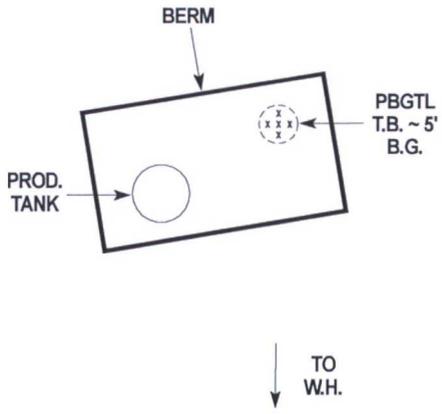
REFERENCE POINT:	WELL HEAD (W.H.) GPS COORD.: <b>36.73163 X 108.12551</b>	GL ELEV.: <b>5,589'</b>
1) <b>21 BGT (SW/DB)</b>	GPS COORD.: <b>36.73200 X 108.12550</b>	DISTANCE/BEARING FROM WH.: <b>141', N0.5E</b>
2) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____
3) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____
4) _____	GPS COORD.: _____	DISTANCE/BEARING FROM WH.: _____

SAMPLING DATA:	CHAIN OF CUSTODY RECORD(S) # OR LAB USED: <b>HALL</b>	OVM READING (ppm)
1) SAMPLE ID: <b>5PC - TB @ 5' (21)</b>	SAMPLE DATE: <b>12/09/16</b> SAMPLE TIME: <b>1130</b> LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b>	<b>NA</b>
2) SAMPLE ID: _____	SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____	_____
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 / <input checked="" type="checkbox"/> SILTY SAND / SILT / SILTY CLAY / CLAY / <input type="checkbox"/> GRAVEL / <input type="checkbox"/> OTHER <b>BEDROCK (SANDSTONE)</b>
SOIL COLOR: <b>DARK YELLOWISH ORANGE</b>	PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC
COHESION (ALL OTHERS): <input checked="" type="checkbox"/> NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / <input type="checkbox"/> HIGHLY COHESIVE	DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD
CONSISTENCY (NON COHESIVE SOILS): <input type="checkbox"/> LOOSE / <input checked="" type="checkbox"/> FIRM / 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 / MOIST / WET / SATURATED / 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. <b>5</b>	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: <b>WELL PAD SHARED WITH BP'S GCU #504 &amp; ENCLOSED BY PERIMETER SECURITY FENCE. NMOCD OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. COLLECTED SAMPLE FROM SOIL ABOVE SANDSTONE.</b>	
SOIL IMPACT DIMENSION ESTIMATION: <b>NA</b> ft. X <b>NA</b> ft. X <b>NA</b> ft.	EXCAVATION ESTIMATION (Cubic Yards): <b>NA</b>
DEPTH TO GROUNDWATER: <b>&lt;100'</b>	NEAREST WATER SOURCE: <b>&gt;1,000'</b> NEAREST SURFACE WATER: <b>&lt;1,000'</b> NMOCD TPH CLOSURE STD: <b>100</b> ppm

SITE SKETCH	BGT Located: off <input checked="" type="checkbox"/> on site	PLOT PLAN circle: <input checked="" type="checkbox"/> attached	OVM CALIB. READ. = <b>NA</b> ppm RF=0.52
			OVM CALIB. GAS = <b>NA</b> ppm
			TIME: <b>NA</b> am/pm DATE: <b>NA</b>



**X - S.P.D.**

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.

<b>MISCELL. NOTES</b>	
WO:	
REF. #: <b>P - 756</b>	
VID: <b>VHIXONEVB2</b>	
PJ #:	
Permit date(s): <b>06/14/10</b>	
OCD Appr. date(s): <b>11/08/16</b>	
Tank ID	OVM = Organic Vapor Meter ppm = parts per million
<b>B</b>	BGT Sidewalls Visible: <b>Y / (N)</b>
	BGT Sidewalls Visible: <b>Y / N</b>
	BGT Sidewalls Visible: <b>Y / N</b>
Magnetic declination: <b>10° E</b>	

NOTES: <b>GOOGLE EARTH IMAGERY DATE: 3/15/2015.</b>	ONSITE: <b>12/09/16</b>
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**Hall Environmental Analysis Laboratory, Inc.**

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TB@5'(21)

Project: GCU 133E

Collection Date: 12/9/2016 11:30:00 AM

Lab ID: 1612560-001

Matrix: MEOH (SOIL)

Received Date: 12/10/2016 10:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>
Chloride	ND	30		mg/Kg	20	12/12/2016 12:04:37 PM	29142
<b>EPA METHOD 8015D MOD: GASOLINE RANGE</b>							Analyst: <b>DJF</b>
Gasoline Range Organics (GRO)	ND	3.7		mg/Kg	1	12/12/2016 2:20:09 PM	G39323
Surr: BFB	99.5	70-130		%Rec	1	12/12/2016 2:20:09 PM	G39323
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>TOM</b>
Diesel Range Organics (DRO)	ND	9.6		mg/Kg	1	12/12/2016 10:55:06 AM	29117
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	12/12/2016 10:55:06 AM	29117
Surr: DNOP	83.0	70-130		%Rec	1	12/12/2016 10:55:06 AM	29117
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>							Analyst: <b>DJF</b>
Benzene	ND	0.018		mg/Kg	1	12/12/2016 2:20:09 PM	S39323
Toluene	ND	0.037		mg/Kg	1	12/12/2016 2:20:09 PM	S39323
Ethylbenzene	ND	0.037		mg/Kg	1	12/12/2016 2:20:09 PM	S39323
Xylenes, Total	ND	0.073		mg/Kg	1	12/12/2016 2:20:09 PM	S39323
Surr: 1,2-Dichloroethane-d4	101	70-130		%Rec	1	12/12/2016 2:20:09 PM	S39323
Surr: 4-Bromofluorobenzene	90.6	70-130		%Rec	1	12/12/2016 2:20:09 PM	S39323
Surr: Dibromofluoromethane	99.0	70-130		%Rec	1	12/12/2016 2:20:09 PM	S39323
Surr: Toluene-d8	94.8	70-130		%Rec	1	12/12/2016 2:20:09 PM	S39323

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	W	Sample container temperature is out of limit as specified

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1612560  
 13-Dec-16

**Client:** Blagg Engineering  
**Project:** GCU 133E

Sample ID	<b>MB-29142</b>	SampType:	<b>mblk</b>	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>29142</b>	RunNo:	<b>39341</b>					
Prep Date:	<b>12/12/2016</b>	Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1231613</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	<b>LCS-29142</b>	SampType:	<b>lcs</b>	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>29142</b>	RunNo:	<b>39341</b>					
Prep Date:	<b>12/12/2016</b>	Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1231614</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.9	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
- W Sample container temperature is out of limit as specified

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1612560

13-Dec-16

**Client:** Blagg Engineering

**Project:** GCU 133E

Sample ID	<b>LCS-29117</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8015M/D: Diesel Range Organics</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>29117</b>	RunNo:	<b>39305</b>					
Prep Date:	<b>12/12/2016</b>	Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1230437</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	10	50.00	0	92.1	62.6	124			
Surr: DNOP	3.9		5.000		77.4	70	130			

Sample ID	<b>MB-29117</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8015M/D: Diesel Range Organics</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>29117</b>	RunNo:	<b>39305</b>					
Prep Date:	<b>12/12/2016</b>	Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1230438</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	8.0		10.00		80.4	70	130			

**Qualifiers:**

- |   |   |
|---|---|
| * 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 | W Sample container temperature is out of limit as specified |

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1612560  
 13-Dec-16

**Client:** Blagg Engineering  
**Project:** GCU 133E

Sample ID <b>rb</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>PBS</b>	Batch ID: <b>S39323</b>		RunNo: <b>39323</b>							
Prep Date:	Analysis Date: <b>12/12/2016</b>		SeqNo: <b>1231105</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.51		0.5000		103	70	130			
Surr: 4-Bromofluorobenzene	0.45		0.5000		89.8	70	130			
Surr: Dibromofluoromethane	0.52		0.5000		105	70	130			
Surr: Toluene-d8	0.47		0.5000		94.8	70	130			

Sample ID <b>100ng lcsb</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>S39323</b>		RunNo: <b>39323</b>							
Prep Date:	Analysis Date: <b>12/12/2016</b>		SeqNo: <b>1231106</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.2	0.025	1.000	0	115	70	130			
Toluene	1.0	0.050	1.000	0	104	70	130			
Surr: 1,2-Dichloroethane-d4	0.53		0.5000		107	70	130			
Surr: 4-Bromofluorobenzene	0.43		0.5000		85.6	70	130			
Surr: Dibromofluoromethane	0.51		0.5000		101	70	130			
Surr: Toluene-d8	0.45		0.5000		90.2	70	130			

**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
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1612560

13-Dec-16

**Client:** Blagg Engineering

**Project:** GCU 133E

Sample ID	<b>rb</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8015D Mod: Gasoline Range</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>G39323</b>	RunNo:	<b>39323</b>					
Prep Date:		Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1231111</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	450		500.0		90.4	70	130			

Sample ID	<b>2.5ug gro lcs</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8015D Mod: Gasoline Range</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>G39323</b>	RunNo:	<b>39323</b>					
Prep Date:		Analysis Date:	<b>12/12/2016</b>	SeqNo:	<b>1231112</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	26	5.0	25.00	0	103	62.9	123			
Surr: BFB	490		500.0		97.0	70	130			

**Qualifiers:**

- |   |   |
|---|---|
| * 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 | W Sample container temperature is out of limit as specified |



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# Sample Log-In Check List

Client Name: **BLAGG** Work Order Number: **1612560** RcptNo: **1**

Received by/date:	<i>[Signature]</i>	<i>12/10/16</i>
Logged By:	Lindsay Mangin	12/10/2016 10:00:00 AM <i>[Signature]</i>
Completed By:	Lindsay Mangin	12/12/2016 7:31:45 AM <i>[Signature]</i>
Reviewed By:	<i>aj</i>	<i>12/12/16</i>

### Chain of Custody

- Custody seals intact on sample bottles? Yes  No  Not Present
- Is Chain of Custody complete? Yes  No  Not Present
- How was the sample delivered? Courier

### Log In

- Was an attempt made to cool the samples? Yes  No  NA
- Were all samples received at a temperature of >0° C to 6.0°C Yes  No  NA
- Sample(s) in proper container(s)? Yes  No
- Sufficient sample volume for indicated test(s)? Yes  No
- Are samples (except VOA and ONG) properly preserved? Yes  No
- Was preservative added to bottles? Yes  No  NA
- VOA vials have zero headspace? Yes  No  No VOA Vials
- Were any sample containers received broken? Yes  No
- Does paperwork match bottle labels? (Note discrepancies on chain of custody) Yes  No
- Are matrices correctly identified on Chain of Custody? Yes  No
- Is it clear what analyses were requested? Yes  No
- 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)

- Was client notified of all discrepancies with this order? Yes  No  NA

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> 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	3.4	Good	Yes			



