

istrict I
25 N. French Dr., Hobbs, NM 88240
istrict II
1 S. First St., Artesia, NM 88210
istrict III
00 Rio Brazos Road, Aztec, NM 87410
istrict IV
220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011

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 America Production Co.	Contact: Steve Moskal
Address: 380 Airport Rd., Durango, CO 81303	Telephone No.: 505-330-9179
Facility Name: Gallegos Canyon Unit 042	Facility Type: Water Disposal Well
Surface Owner: Fee	Mineral Owner: Federal
API No. 3004507557	

LOCATION OF RELEASE

Unit Letter N	Section 12	Township 28N	Range 13W	Feet from the 990	North/South Line South	Feet from the 1,650	East/West Line West	County: San Juan
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Latitude 36.67275° Longitude -108.117408°

NATURE OF RELEASE

Type of Release: produced water	Volume of Release: 14 bbl	Volume Recovered: 0 bbls
Source of Release: Packing leak on rod pump	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: 1/16/2018; 11:00 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Steve Moskal	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

OIL CONS. DIV DIST. 3
2/16/18 11:00 AM

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Packing on rod pump failed allowing produced water to leak for an unknown duration. The area of impacts was measured to determine the discharge volume. The well was shut in and the packing replaced. The impacted soil was raked in and sampled.

Describe Area Affected and Cleanup Action Taken.* The soil samples indicate TPH and chlorides above the site specific spill and release guidelines. Delineation or remediation will be performed at a later date. Laboratory results are attached.

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: 2/6/18	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval: Sample for	Attached <input checked="" type="checkbox"/>
Date: January 29, 2018	Phone: 505-330-9179	TPH, BTEX, Benzene, Chlorides.

* Attach Additional Sheets If Necessary

#HUCS 1803732121 START BURN

15

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 1/31/18 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number KS1803732121 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District III office in Aztec on or before 2/20/18. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

- Nominal detection limits for field and laboratory analyses must be provided.

- Composite sampling is not generally allowed.

- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

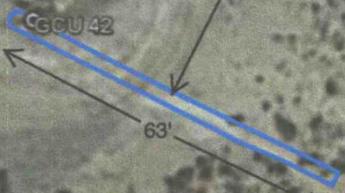
GCU 42

(N) Sec 12 - T28N - R13W

API: 30-045-07557

January 16, 2018 - Spill Sampling
Collect 5-pt composite @ 6" depth along release footprint
Field OVM = 2.0 ppm
Laboratory Test Results:
TPH = Pending
BTEX = Pending
Chloride = Pending

Release Footprint
(63' x 6' wide)



Rig Anchors



BP AMERICA PRODUCTION COMPANY

GALLEGOS CANYON UNIT 042

API 3004507557 LEASE NMSF078807A

990 FSL 1650 FWL (N) SEC 12 T28N R13W

San Juan County ELEV 5582

LAT 36° 40' 19.632"

LONG 108° 10' 23.916"







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

January 26, 2018

Steven Moskal
Blagg Engineering
P. O. Box 87
Bloomfield, NM 87413
TEL: (505) 632-1199
FAX (505) 632-3903

RE: GCU 42

OrderNo.: 1801825

Dear Steven Moskal:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/17/2018 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 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 light blue horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: SPILL-5-pt @ 6"

Project: GCU 42

Collection Date: 1/16/2018 1:35:00 PM

Lab ID: 1801825-001

Matrix: SOIL

Received Date: 1/17/2018 7:10:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							
							Analyst: MRA
Chloride	5000	300		mg/Kg	200	1/25/2018 6:29:31 PM	36176
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							
							Analyst: TOM
Diesel Range Organics (DRO)	130	10		mg/Kg	1	1/18/2018 3:58:30 PM	36084
Motor Oil Range Organics (MRO)	420	50		mg/Kg	1	1/18/2018 3:58:30 PM	36084
Surr: DNOP	118	70-130		%Rec	1	1/18/2018 3:58:30 PM	36084
EPA METHOD 8015D: GASOLINE RANGE							
							Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	1/18/2018 2:38:27 PM	36077
Surr: BFB	91.6	15-316		%Rec	1	1/18/2018 2:38:27 PM	36077
EPA METHOD 8021B: VOLATILES							
							Analyst: NSB
Benzene	ND	0.025		mg/Kg	1	1/18/2018 2:38:27 PM	36077
Toluene	ND	0.050		mg/Kg	1	1/18/2018 2:38:27 PM	36077
Ethylbenzene	ND	0.050		mg/Kg	1	1/18/2018 2:38:27 PM	36077
Xylenes, Total	ND	0.099		mg/Kg	1	1/18/2018 2:38:27 PM	36077
Surr: 4-Bromofluorobenzene	109	80-120		%Rec	1	1/18/2018 2:38:27 PM	36077

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

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	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
	PQL Practical Quantitative Limit	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#: 1801825

26-Jan-18

Client: Blagg Engineering

Project: GCU 42

Sample ID	MB-36176	SampType:	mblk	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	36176	RunNo:	48666					
Prep Date:	1/24/2018	Analysis Date:	1/24/2018	SeqNo:	1566124	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-36176	SampType:	lcs	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	36176	RunNo:	48666					
Prep Date:	1/24/2018	Analysis Date:	1/24/2018	SeqNo:	1566125	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	91.6	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
- PQL Practical Quantitative Limit
- 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#: 1801825

26-Jan-18

Client: Blagg Engineering

Project: GCU 42

Sample ID	MB-36084	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	36084	RunNo:	48529					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1560963	Units:	mg/Kg			
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	10		10.00		105	70	130			

Sample ID	1801825-001AMS	SampType:	MS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SPILL-5-pt @ 6"	Batch ID:	36084	RunNo:	48529					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1561368	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	200	10	50.61	127.5	145	55.8	125			S
Surr: DNOP	6.7		5.061		132	70	130			S

Sample ID	1801825-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SPILL-5-pt @ 6"	Batch ID:	36084	RunNo:	48529					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1561369	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	160	9.7	48.73	127.5	58.0	55.8	125	25.3	20	R
Surr: DNOP	6.1		4.873		125	70	130	0	0	

Sample ID	LCS-36084	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	36084	RunNo:	48529					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1561380	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	10	50.00	0	89.9	70	130			
Surr: DNOP	5.0		5.000		101	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
- PQL Practical Quantitative Limit
- 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#: 1801825

26-Jan-18

Client: Blagg Engineering

Project: GCU 42

Sample ID MB-36077	SampType: MBLK	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: PBS	Batch ID: 36077	RunNo: 48542								
Prep Date: 1/17/2018	Analysis Date: 1/18/2018	SeqNo: 1561107 Units: mg/Kg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	880		1000		88.4	15	316			

Sample ID LCS-36077	SampType: LCS	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: LCSS	Batch ID: 36077	RunNo: 48542								
Prep Date: 1/17/2018	Analysis Date: 1/18/2018	SeqNo: 1561108 Units: mg/Kg								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	101	75.9	131			
Surr: BFB	950		1000		94.6	15	316			

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
- PQL Practical Quantitative Limit
- 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#: 1801825

26-Jan-18

Client: Blagg Engineering

Project: GCU 42

Sample ID	MB-36077	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	36077	RunNo:	48542					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1561128	Units:	mg/Kg			
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: 4-Bromofluorobenzene	0.98		1.000		97.6	80	120			

Sample ID	LCS-36077	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	36077	RunNo:	48542					
Prep Date:	1/17/2018	Analysis Date:	1/18/2018	SeqNo:	1561129	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.025	1.000	0	93.0	77.3	128			
Toluene	0.94	0.050	1.000	0	93.5	79.2	125			
Ethylbenzene	0.91	0.050	1.000	0	91.5	80.7	127			
Xylenes, Total	2.8	0.10	3.000	0	93.4	81.6	129			
Surr: 4-Bromofluorobenzene	0.95		1.000		95.2	80	120			

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
- PQL Practical Quantitative Limit
- 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



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: **1801825**

RcptNo: **1**

Received By: **Anne Thorne** 1/17/2018 7:10:00 AM

Anne Thorne

Completed By: **Dennis Suazo** 1/17/2018 8:55:46 AM

Dennis Suazo

Reviewed By: **SRE 01/17/18**

Chain of Custody

1. Is Chain of Custody complete? Yes No Not Present
2. How was the sample delivered? Courier

Log In

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

of preserved bottles checked for pH: _____
(<2 or >12 unless noted)
Adjusted? _____
Checked by: _____

Special Handling (if applicable)

15. 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: _____	

16. Additional remarks:

17. Cooler Information

Cooler No.	Temp °C	Condition	Seal Intact	Seal No.	Seal Date	Signed By
1	1.4	Good	Not Present			

