

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 April 3, 2017

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 Company	Contact	Erin Garifalos
Address	200 Energy Court, Farmington, NM 87401	Telephone No.	(832) 609-7048
Facility Name	GCU 156E	Facility Type	Natural Gas Well

Surface Owner	Indian	Mineral Owner	Indian	API No.	3004526234
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	26	28N	13W	1,850	South	790	West	San Juan

Latitude 36.63117 Longitude -108.19533 NAD83

NATURE OF RELEASE

Type of Release:	none	Volume of Release:	unknown	Volume Recovered:	N/A
Source of Release:	below grade tank -21 bbl	Date and Hour of Occurrence:	n/a	Date and Hour of Discovery:	n/a
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input 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.			

NMOCD

MAY 09 2018

DISTRICT III

Describe Cause of Problem and Remedial Action Taken.*
Sampling of the soil beneath the BGT was done during removal. Soil analysis resulted for Chlorides, BTEX, and TPH below BGT closure standards, except TPH and BTEX. The Spill & Release Guidelines (SRG) ranking criteria was interpreted as ten (10), giving a total TPH closure standard of 1,000 mg/Kg (surface water within the 1,000 ft. setback). A man-made stock pond visible on the attached aerial & topo. quad. maps is the surface water feature. The stock pond use appears to be abandoned. Due to the stock pond's abandonment a variance is requested to close this pit under ranking criteria 0; changing the TPH standard to 5,000 mg/kg. Field reports, laboratory results, and maps are attached.

Describe Area Affected and Cleanup Action Taken.*
 Pending approval of variance. Final laboratory analysis 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: <i>erin garifalos</i>	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Erin Garifalos	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: Field Environmental Coordinator	Approval Date: 5/10/18	Expiration Date:
E-mail Address: erin.garifalos@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: May 3, 2018 Phone: (832) 609-7048		

* Attach Additional Sheets If Necessary

#A 1518 1303 0556

(12)

CLIENT: **BP** **BLAGG ENGINEERING, INC.**
P.O. BOX 87, BLOOMFIELD, NM 87413
(505) 632-1199 API #: **3004526234**
TANK ID (if applicable): **B**

FIELD REPORT: (circle one): **BGT CONFIRMATION** / **RELEASE INVESTIGATION** / **OTHER:** PAGE #: **1** of **1**

SITE INFORMATION: SITE NAME: **GCU # 156E** DATE STARTED: **03/06/18**
QUAD/UNIT: **L** SEC: **26** TWP: **28N** RNG: **13W** PM: **NM** CNTY: **SJ** ST: **NM** DATE FINISHED:
1/4 - 1/4 FOOTAGE: **1,850'S / 790'W** **NW/SW** LEASE TYPE: **FEDERAL / STATE / FEE** **INDIAN** ENVIRONMENTAL SPECIALIST(S): **NJV**
LEASE #: **I-149-IND-8472** PROD. FORMATION: **DK** CONTRACTOR: **STRIKE BP - J. GONZALES**

REFERENCE POINT: WELL HEAD (W.H.) GPS COORD.: **36.63107 X 108.19482** GL ELEV.: **6,076'**
1) **21 BGT (SW/DB)** GPS COORD.: **36.63117 X 108.19533** DISTANCE/BEARING FROM W.H.: **156', N77.5W**
2) GPS COORD.: DISTANCE/BEARING FROM W.H.:
3) GPS COORD.: DISTANCE/BEARING FROM W.H.:
4) GPS COORD.: DISTANCE/BEARING FROM W.H.:

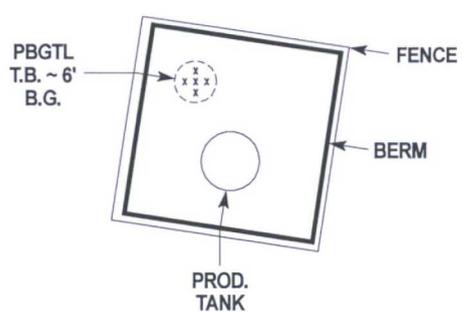
SAMPLING DATA: CHAIN OF CUSTODY RECORD(S) # OR LAB USED: **HALL** OVM READING (ppm) **3,323**
1) SAMPLE ID: **5PC - TB @ 6' (21)** SAMPLE DATE: **03/06/18** SAMPLE TIME: **1015** LAB ANALYSIS: **8015B/8021B/300.0 (CI)**
2) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:
3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:
4) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:
5) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

SOIL DESCRIPTION: SOIL TYPE: **SAND** **SILTY SAND** SILT / SILTY CLAY / CLAY / GRAVEL / OTHER
SOIL COLOR: **MOSTLY DARK YELLOWISH ORANGE** PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC
COHESION (ALL OTHERS): NON COHESIVE / **SLIGHTLY COHESIVE** / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD
CONSISTENCY (NON COHESIVE SOILS): LOOSE / **FIRM** / DENSE / VERY DENSE HC ODOR DETECTED: **YES** / NO EXPLANATION - **DISCOLORED SOILS ONLY.**
MOISTURE: DRY / **SLIGHTLY MOIST** / **MOIST** / WET / SATURATED / SUPER SATURATED
SAMPLE TYPE: GRAB **COMPOSITE** # OF PTS. **5** ANY AREAS DISPLAYING WETNESS: YES NO EXPLANATION -
DISCOLORATION/STAINING OBSERVED: **YES** / NO EXPLANATION - **MEDIUM GRAY BENEATH BGT.**

SITE OBSERVATIONS: LOST INTEGRITY OF EQUIPMENT: **YES** / NO EXPLANATION - **BGT BOTTOM CREASE & INSPECTION PORT**
APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: **YES** / NO EXPLANATION: **DISCOLORED SOILS & STRONG APPARENT HYDROCARBON ODOR.**
EQUIPMENT SET OVER RECLAIMED AREA: YES NO EXPLANATION -
OTHER: **NMOC D OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING.**

EXCAVATION DIMENSION ESTIMATION: _____ ft. X _____ ft. X _____ ft. EXCAVATION ESTIMATION (Cubic Yards): _____
DEPTH TO GROUNDWATER: **>100'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **<1,000'** NMOC D TPH CLOSURE STD: **1,000** ppm

SITE SKETCH BGT Located : off **on** site PLOT PLAN circle: **attached** OVM CALIB. READ. = **100.0** ppm RF=1.00
OVM CALIB. GAS = **100** ppm
TIME: **10:20** am/pm DATE: **03/06/18**



N ↑
TO W.H. →

MISCELL. NOTES
WO:
REF #: **P-935**
VID: **VHIXONEVB2**
PJ #:
Permit date(s): **06/08/10**
OCD Appr. date(s): **03/07/17**
Tank ID: **B** OVM = Organic Vapor Meter ppm = parts per million
B BGT Sidewalls Visible: Y / **N**
BGT Sidewalls Visible: Y / N
BGT Sidewalls Visible: Y / N
Magnetic declination: **10° E**

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; PBGT = 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.

NOTES: **GOOGLE EARTH IMAGERY DATE: 3/15/2015.** ONSITE: **03/06/18**

Analytical Report

Lab Order 1803329

Date Reported: 3/8/2018

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
 Project: GCU 156E
 Lab ID: 1803329-001

Matrix: SOIL

Client Sample ID: 5PC-TB @ 6' (21)
 Collection Date: 3/6/2018 10:15:00 AM
 Received Date: 3/7/2018 7:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: CJS
Chloride	370	30		mg/Kg	20	3/7/2018 11:59:03 AM	36886
EPA METHOD 8015D MOD: GASOLINE RANGE							Analyst: AG
Gasoline Range Organics (GRO)	2200	35		mg/Kg	10	3/7/2018 11:13:47 AM	G49610
Surr: BFB	110	70-130		%Rec	10	3/7/2018 11:13:47 AM	G49610
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	370	9.2		mg/Kg	1	3/7/2018 11:24:29 AM	36884
Motor Oil Range Organics (MRO)	ND	46		mg/Kg	1	3/7/2018 11:24:29 AM	36884
Surr: DNOP	94.3	70-130		%Rec	1	3/7/2018 11:24:29 AM	36884
EPA METHOD 8260B: VOLATILES SHORT LIST							Analyst: AG
Benzene	ND	0.17		mg/Kg	10	3/7/2018 11:13:47 AM	R49610
Toluene	ND	0.35		mg/Kg	10	3/7/2018 11:13:47 AM	R49610
Ethylbenzene	ND	0.35		mg/Kg	10	3/7/2018 11:13:47 AM	R49610
Xylenes, Total	38	0.69		mg/Kg	10	3/7/2018 11:13:47 AM	R49610
Surr: 4-Bromofluorobenzene	107	70-130		%Rec	10	3/7/2018 11:13:47 AM	R49610
Surr: Toluene-d8	97.6	70-130		%Rec	10	3/7/2018 11:13:47 AM	R49610

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#: 1803329

08-Mar-18

Client: Blagg Engineering

Project: GCU 156E

Sample ID	MB-36886	SampType:	mbk	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	36886	RunNo:	49611					
Prep Date:	3/7/2018	Analysis Date:	3/7/2018	SeqNo:	1604728	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-36886	SampType:	lcs	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	36886	RunNo:	49611					
Prep Date:	3/7/2018	Analysis Date:	3/7/2018	SeqNo:	1604730	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	15	1.5	15.00	0	101	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#: 1803329

08-Mar-18

Client: Blagg Engineering

Project: GCU 156E

Sample ID	LCS-36884	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	36884	RunNo:	49601					
Prep Date:	3/7/2018	Analysis Date:	3/7/2018	SeqNo:	1603591	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	95.0	70	130			
Surr: DNOP	3.8		5.000		75.8	70	130			

Sample ID	MB-36884	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	36884	RunNo:	49601					
Prep Date:	3/7/2018	Analysis Date:	3/7/2018	SeqNo:	1603592	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	8.6		10.00		86.4	70	130			

Sample ID	LCS-36874	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	36874	RunNo:	49601					
Prep Date:	3/6/2018	Analysis Date:	3/7/2018	SeqNo:	1604369	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.1		5.000		81.5	70	130			

Sample ID	MB-36874	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	36874	RunNo:	49601					
Prep Date:	3/6/2018	Analysis Date:	3/7/2018	SeqNo:	1604370	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.7		10.00		86.7	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 |
| 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#: 1803329

08-Mar-18

Client: Blagg Engineering

Project: GCU 156E

Sample ID	100ng lcs	SampType:	LCS4	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	BatchQC	Batch ID:	R49610	RunNo:	49610					
Prep Date:		Analysis Date:	3/7/2018	SeqNo:	1603856	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	93.4	80	120			
Toluene	0.93	0.050	1.000	0	93.1	80	120			
Ethylbenzene	0.91	0.050	1.000	0	91.4	80	120			
Xylenes, Total	2.7	0.10	3.000	0	90.0	80	120			
Surr: 4-Bromofluorobenzene	0.45		0.5000		90.5	70	130			
Surr: Toluene-d8	0.48		0.5000		96.2	70	130			

Sample ID	rb	SampType:	MBLK	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	PBS	Batch ID:	R49610	RunNo:	49610					
Prep Date:		Analysis Date:	3/7/2018	SeqNo:	1603862	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	0.55		0.5000		111	70	130			
Surr: Toluene-d8	0.48		0.5000		95.8	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#: 1803329

08-Mar-18

Client: Blagg Engineering

Project: GCU 156E

Sample ID	2.5ug gro lcs	SampType:	LCS	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	LCSS	Batch ID:	G49610	RunNo:	49610					
Prep Date:		Analysis Date:	3/7/2018	SeqNo:	1603853	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	28	5.0	25.00	0	112	70	130			
Surr: BFB	510		500.0		103	70	130			

Sample ID	rb	SampType:	MBLK	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	PBS	Batch ID:	G49610	RunNo:	49610					
Prep Date:		Analysis Date:	3/7/2018	SeqNo:	1603854	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	590		500.0		119	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 |
| 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 |



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: **1803329**

RcptNo: **1**

Received By: **Anne Thorne** 3/7/2018 7:00:00 AM
 Completed By: **Anne Thorne** 3/7/2018 7:28:49 AM
 Reviewed By: **[Signature]** 3/7/18

Anne Thorne
Anne Thorne

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)

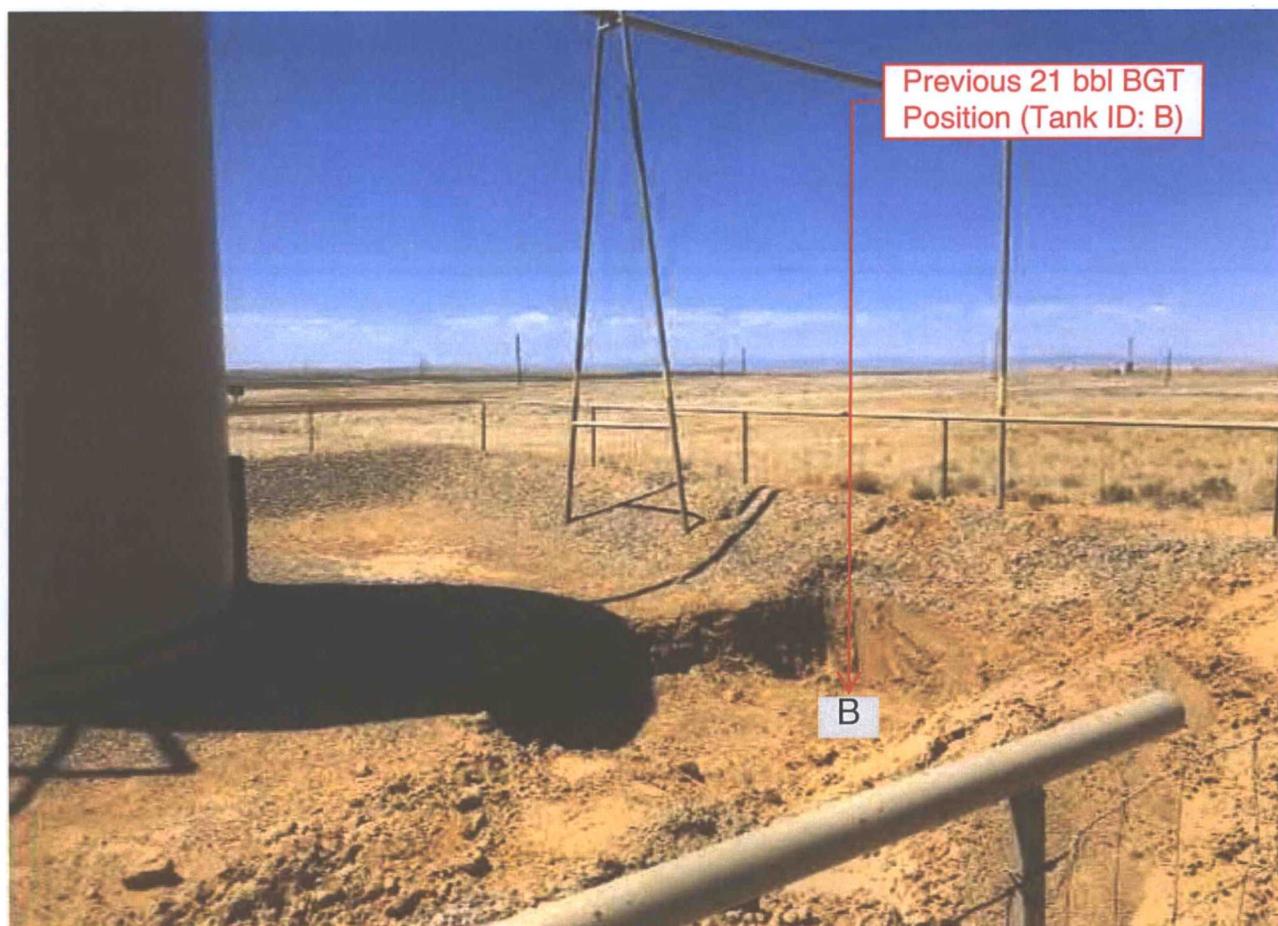
15. Was client notified of all discrepancies with this order? Yes No NA

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:

Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.4	Good	Yes			

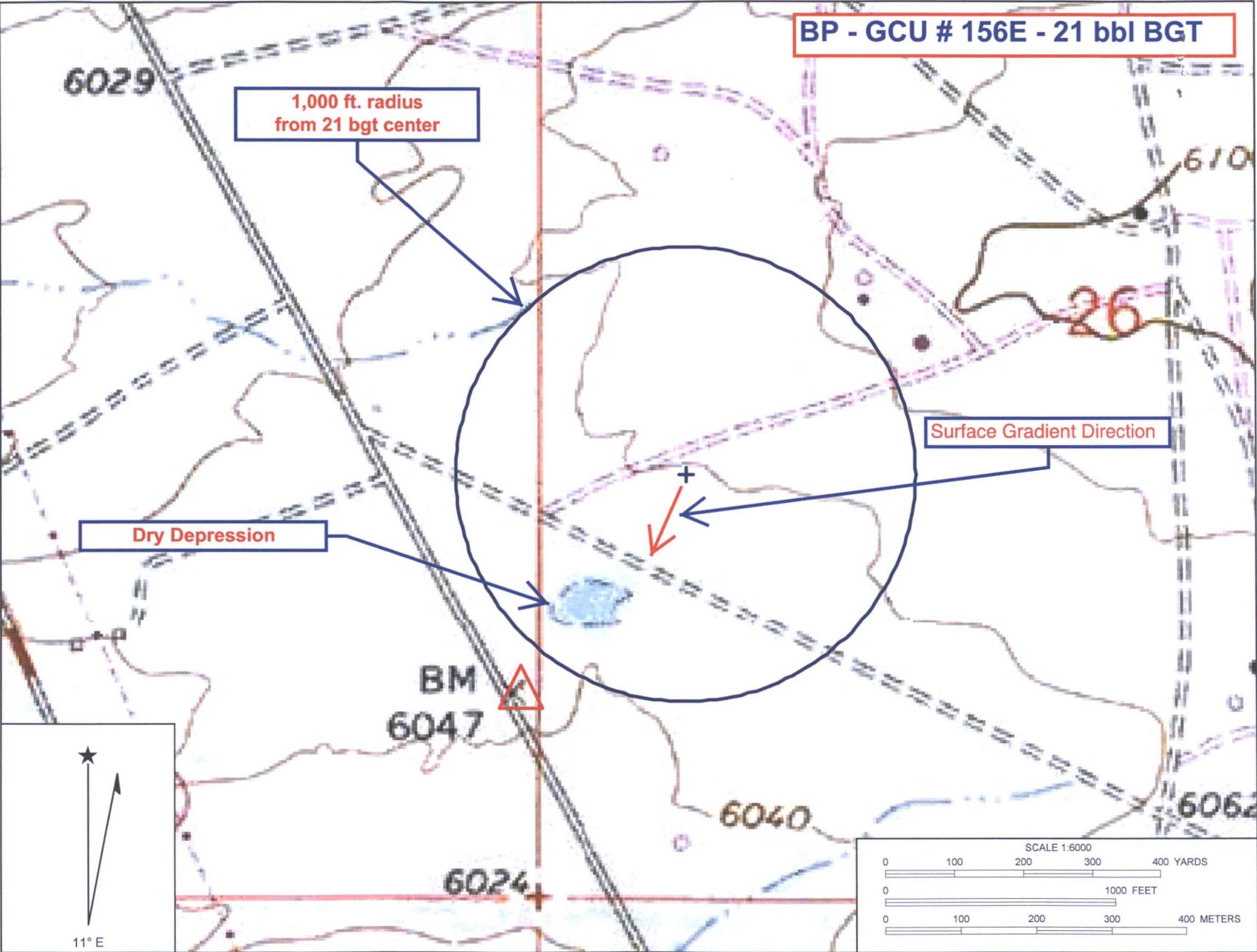


BP - GCU # 156E - 21 bbl BGT

1,000 ft. radius
from 21 bgt center

Surface Gradient Direction

Dry Depression



BP - GCU 156E

(L) Section 26, T28N, R13W
API #: 3004526234

Imagery date: 3/15/2015
WH GPS Coord.: 36.631070,-108.194820

Dry depression

WH

Google earth

© 2018 Google

900 ft

