

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company: BP	Contact: Steve Moskal
Address: 380 Airport Road, Suite A, Durango, CO 81303	Telephone No.: 505-330-9179
Facility Name: Gallegos Canyon Unit 089E	Facility Type: Natural gas well
Surface Owner: Tribal	Mineral Owner: Federal
API No. 3004526187	

**LOCATION OF RELEASE**

Unit Letter L	Section 6	Township 27N	Range 12W	Feet from the 1840	North/South Line South	Feet from the 980	East/West Line West	County: San Juan
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Latitude 36.60215° Longitude -108.15885°

**NATURE OF RELEASE**

Type of Release: unknown hydrocarbons	Volume of Release: unknown	Volume Recovered: none
Source of Release: Historical impacts, possible former earthen pit	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: February 26, 2018; 1:00 PM
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: <b>NMOCD</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**APR 03 2018**

**DISTRICT III**


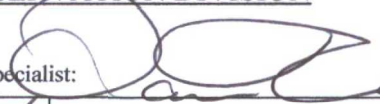
If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* During BGT closure activities, impacts were identified beneath the 95 bbl tank. Lab analysis confirms the impacts are above the BGT closure standards and spill and release guidelines with a site ranking of 20.

Describe Area Affected and Cleanup Action Taken.\* The area has not been fully delineated and will be delineated via excavation in the coming weeks. Attached is a proposed workplan to perform soil shredding to remediate impacted soils on site.

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.

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist: 	
Printed Name: Steve Moskal	Approval Date: <u>3/9/2018</u> Expiration Date:	
Title: Field Environmental Coordinator	Conditions of Approval:	
E-mail Address: steven.moskal@bp.com	Attached <input type="checkbox"/>	
Date: April 3, 2018 Phone: 505-330-9179		

\* Attach Additional Sheets If Necessary

Provide OGD 24-Hour  
Notice Prior to Sampling  
Sample 80518021 (Oils)  
NVF 1811642088

## **BP Remediation Plan**

To: Cory Smith, Vanessa Fields(NMOCD), Whitney Thomas (BLM), Steve Austin (NNEPA)  
From: Steve Moskal (BP)  
CC: Jeff Blagg (Blagg Engineering), Emmanuel Adeloye (BLM)  
Date: 4/3/2018  
Re: GALLEGOS CANYON UNIT No. 089E- Ex-situ Soil Remediation – Soil Shredding (L) S-6, T27N, R12W; API #30-045-26187; Serial No.:NM-SF-01757591

Dear Mr. Smith, Mrs. Fields, Mrs. Thomas and Mr. Austin

The Gallegos Canyon Unit (GCU) 089E site is an active natural gas production well location within the San Juan Basin Gas Field in San Juan County, New Mexico. The site is located on Navajo Tribal with federal mineral managed Bureau of Land Management Farmington Field Office (BLM-FFO) and is in an area primarily used for oil and gas production in the vicinity of Navajo Agricultural Products Inc operated land.

### **Background**

Historical impacts were identified at the location on February 26, 2018 during the closure of a below grade tank (BGT). The impacts are likely the result of earthen pits formerly used on the location. No historical documentation is available regarding this pit. Initial site investigation determined additional delineation was required to define the extents of impacts. Vertical delineation of the site has not yet been performed. The well site is operated by BP Production.

### **Site Ranking**

Following the NMOCD site ranking criteria, the site closure standard is 100 ppm TPH, 50 ppm BTEX and 10 ppm benzene:

- Depth to groundwater >100' (0 points)
- Nearest surface water source <200' (20 points)
- Distance to nearest water well or water source <1,000' (0 points)

### **Proposed Remediation – Soil Shredding**

Based on recent success of soil shredding technologies performed on BP remediation sites, BP proposes to use this technology at the subject site. To date, BP has successfully contracted soil shredding of nearly 150,000 cubic yards of soil to meet site closure standards.

Soil shredding involves the excavation of the impacted soil which is then placed in processing equipment, such as a hammer mill or pug mill, to mechanically process and break-up the soil. The soil becomes more uniform and is aerated during the mechanical processing. The soil is then ejected from the processing equipment and a chemical oxidizer is applied, in this case, a 35% solution of hydrogen peroxide and water. The applied concentration of hydrogen peroxide typically ranges from 3-8%. The hydrogen peroxide quickly oxidizes the hydrocarbon impacts (reagents), resulting in soil, water and carbon dioxide (products). Once the soil is processed, it is stockpiled and allowed to sit for approximately 2-5 days of residence time. A composite soil sample is collected from each segregated stockpile and submitted for laboratory analysis to determine the effectiveness of the ex-situ

remediation process. If the laboratory results are of acceptable levels, the soil will be used as backfill to the excavation; if results are unsatisfactory, the soil is passed through the process once more and a subsequent laboratory sample will be collected for laboratory confirmation as described before. Typically, 24 hours of notice is provided to the regulatory agencies for the opportunity to observe and witness the stockpile sampling.

BP proposes to perform the remediation of hydrocarbon impacts by the means of soil shredding. A conservative estimate of approximately 500 cubic yards of soil will be treated through the soil shredding process. BP proposes to treat the impacted soil and segregate windrow stockpiles broken into 100 cubic yard increments. A single, five-point composite, soil sample will be collected to represent each 100 cubic yard stockpile. If necessary, once a baseline of approximately 1,000 cubic yards of soil is consistently and successfully treated, BP will propose to decrease the sampling frequency to 500 cubic yard stockpile segments. The 500 cubic yard sampling modification will be discussed with the NMOCD, NNEPA and BLM for approval and input prior to implementation. BP would expect to have a sampling modification approval from the agencies within 48 working hours from the time of request. The remediation will then continue until complete and sampling will be based on the regulatory agencies approved sampling plan.

Excavation sampling will be in accordance with a typical dig and haul. The sidewalls and base of the excavation will be sampled in a frequency based on the size and progress of the excavation. Agency notification of excavation sampling will also be issued in advanced, 24-48 hours if possible.

BP is currently anticipates mobilizing to the location within the next 2-3weeks. BP plans to shut the well in and remove all necessary surface equipment.

It is understood, that if soil remediation is not successful via the soil shredding, an alternative method such as a dig and haul or soil vapor extraction will be necessary. BP will be in close communications with the agencies in the event an alternative remediation method is required.

#### **Site Closure and Reporting**

Once the soil shredding process is complete, the excavated area will be fully backfilled and compacted, and surface equipment will be re-set. Any necessary interim reclamation will be performed. Final reclamation of the well pad will occur at a later date, once the natural gas production well is plugged and abandoned.

A final remediation report will be delivered to NMOCD and BLM for approval of final site closure regarding the excavation and soil shredding activities within 60 days of the end of remediation.